Custom Care Cleaners Site Inspection

Vancouver, Washington

Technical Direction Document Number: 13-09-0005

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Prepared for:
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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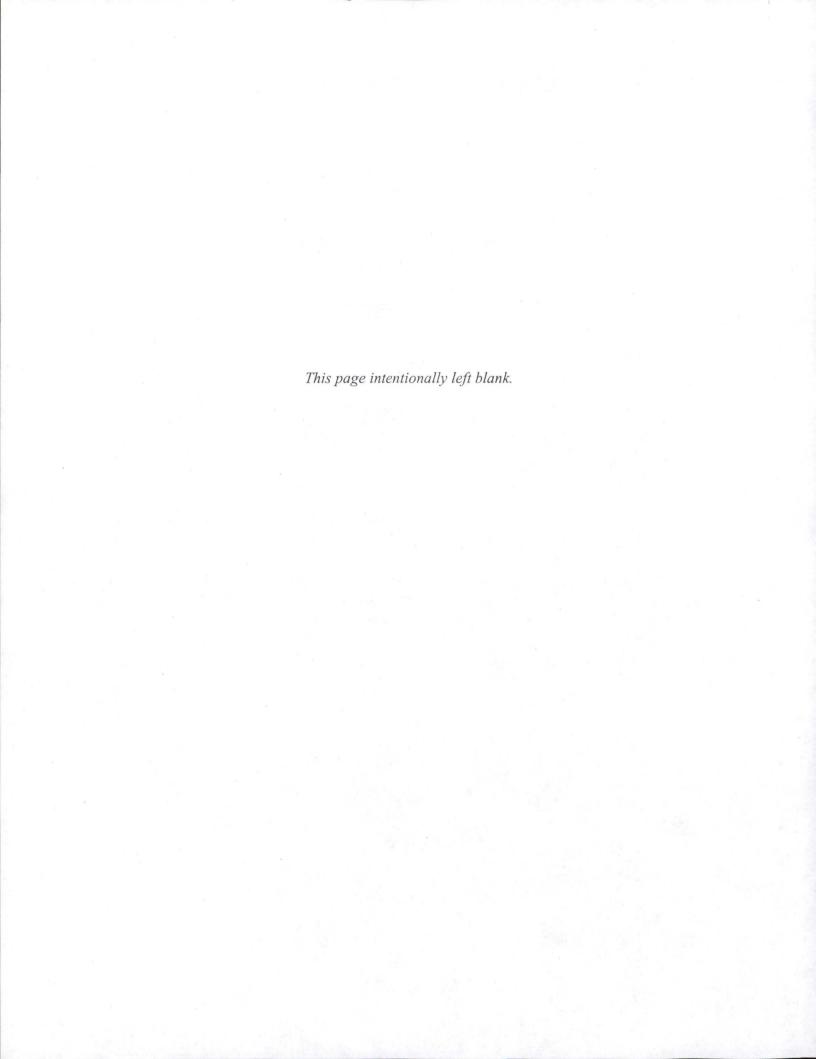
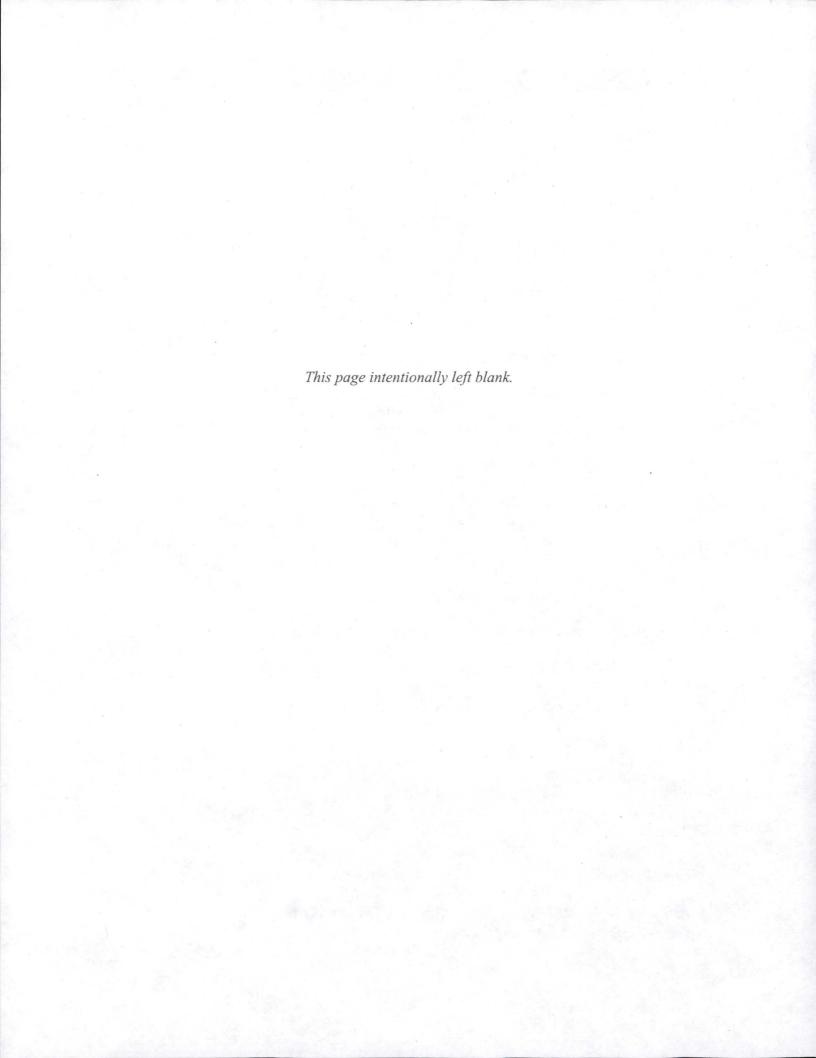


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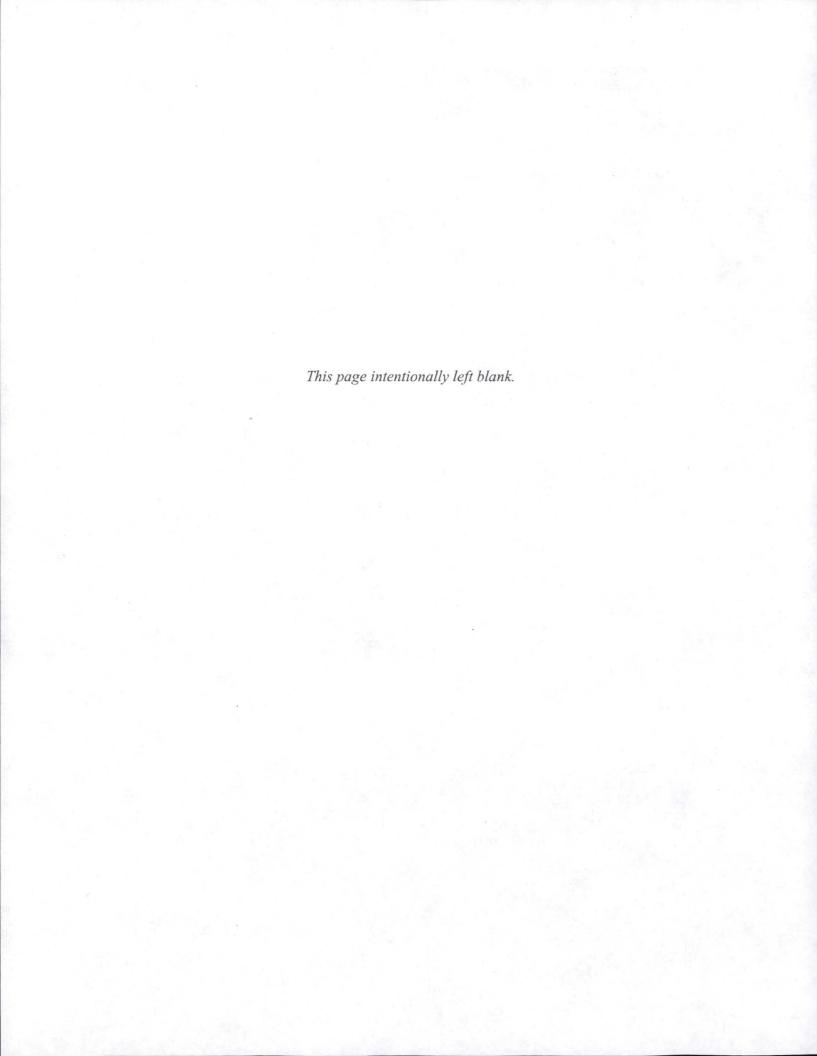
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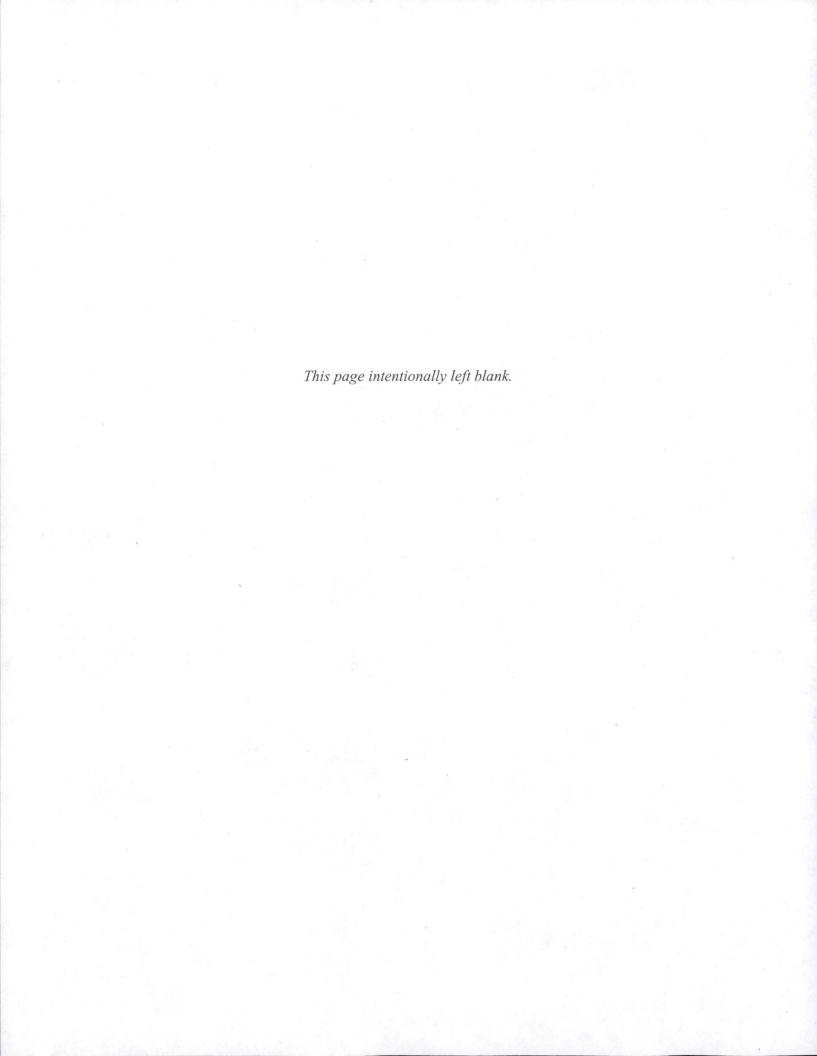
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ist of Abbreviations and Acronyms

Acronym Definition

μg/L Micrograms per Liter
BGS Below Ground Surface

CERCLIS Comprehensive Environmental Response, Compensation and Liability

Information System

CMU Concrete Masonry Unit

DOH Washington State Department of Health

Dx Diesel Extended

E & E Ecology and Environment, Inc.

Ecology Washington State Department of Ecology

EPA United States Environmental Protection Agency

HCID Hydrocarbon Identification MRL Method Reporting Limit

MTCA A Model Toxics Control Act Method A

NPL National Priorities List

NWTPH Northwest Total Petroleum Hydrocarbon

PCE Perchloroethylene

PNE Pacific Northern Environmental Corporation

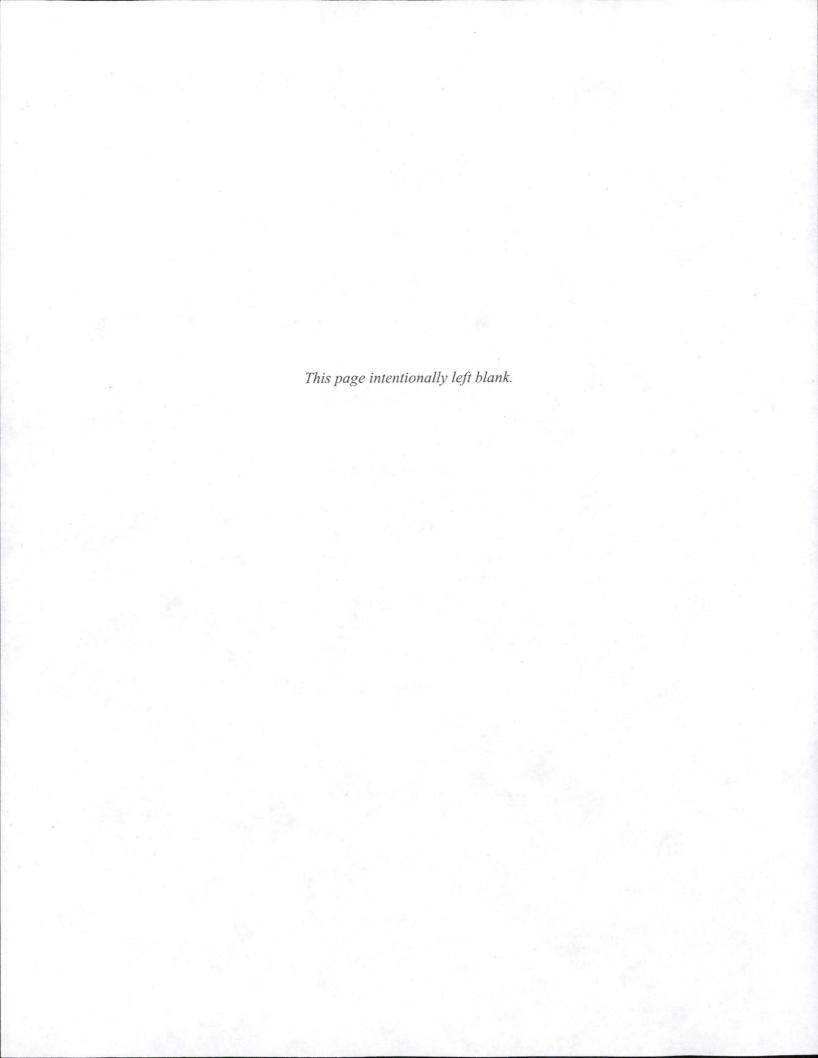
ppm Parts Per Million
SI Site Inspection

START Superfund Technical Assessment and Response Team

TDD Technical Direction Document

TDL Target Distance Limit
UST Underground Storage Tank
VOC Volatile Organic Compound
VWS Vancouver Water Station

WAC Washington Administrative Code



Introduction

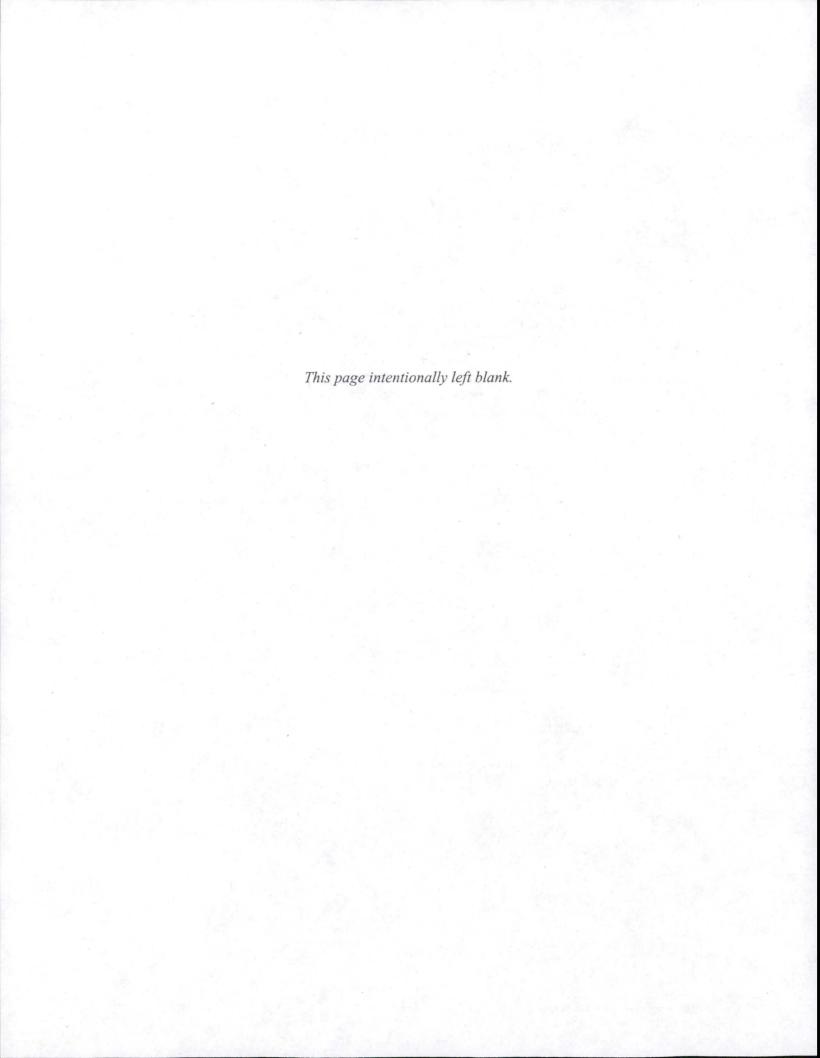
Ecology and Environment, Inc., (E & E) was tasked by the United States Environmental Protection Agency (EPA) to provide technical support for completion of a non-sampling Site Inspection (SI) at the Custom Care Cleaners site in Vancouver, Washington. This SI is based on an evaluation of existing information and interviews conducted with individuals knowledgeable about the site. E & E performed SI activities for this project under Technical Direction Document (TDD) number 13-09-0005 of the EPA Region 10, Superfund Technical Assessment and Response Team (START)-IV, Contract Number EP-S7-13-07.

The specific goals for this SI, as identified by the EPA, are:

- Determine the potential threat to public health or the environment posed by the site;
- Determine the potential for a release of hazardous constituents into the environment; and
- Determine the potential for placement of the site on the National Priorities List (NPL).

Completion of the SI included reviewing existing site information, collecting receptor information within the range of site influence, determining regional characteristics, and conducting a site visit.

This document includes a discussion of background site information (Section 2), a discussion of migration/exposure pathways and potential receptors (targets) (Section 3), a summary of site conditions and a discussion of conclusions (Section 4), and a list of pertinent references (Section 5).



Site Background

2.1 Site Location

Site Name:	Custom Care Cleaners	
CERCLIS ID Number:	WAN001002994	
State Cleanup ID:	3024	
State Facility ID:	1049	
Site Address:	6319 East Mill Plain Boulevard	
	Vancouver, Washington 98661	
Latitude:	45.62785	
Longitude:	-122.60704	
Legal Description:	Township 2 North, Range 2 East, Section 72	
County:	Clark	
Congressional District:	3	
Site Owner(s):	Park Hill Shopping Center, LLC	
	C/O Thompson and Associates, CPA	
	915 Broadway, Suite 310	
	Vancouver, Washington 98660	
Site Operator(s):	Custom Care Cleaners	
	Mark and Pamela Ickert	
	6319 East Mill Plain Boulevard	
	Vancouver, Washington 98661	
Site Contact(s)	Greg Memovich	

2.2 Site Description

Custom Care Cleaners is the current name of a dry cleaning business located in the Park Hill Shopping Center in Vancouver, Washington (Figure 2-1). There are a total of four buildings on the Park Hill Shopping Center property, including one east/west-oriented strip mall building, one north/south-oriented strip mall building, and two single business structures (Figure 2-2). Custom Care Cleaners is located in the east/west-oriented strip mall building.

The Park Hill Shopping Center is located at an elevation of approximately 305 feet above sea level, on land that slopes towards the south/southeast. The parking lot is asphalt paved. Gravel-covered areas are present behind the buildings on their southern side. Much of the southern portion of the property is grass covered. Storm drains are present in the parking lot to manage surface water runoff. The facility is located approximately 1.2 miles north of the Columbia River. The property is provided sewer and water services by the municipality.

Surrounding land use in the area of the site includes commercial property along East Mill Plain Boulevard, with additional retail shopping to the east, and a cemetery located on the western adjacent parcel. Residential development is located to the north beyond East Mill Plain Boulevard and southeast of the Park Hill Shopping Center property. A 76-brand gas station is located northeast of the site (Figures 2-2 and 2-3). Two schools, George C. Marshall Elementary and McLoughlin Middle School, are located approximately 0.2 mile south and southwest of the site, respectively (Figure 2-1).

2.3 Ownership and Development History

The Park Hill Shopping Center was first constructed in 1947 (Lane County, n.d.). An aerial photograph from 1951 shows this construction, with what appears to be the northern portion of the current day Custom Care Cleaners tenant space present, and the strip mall extending east from there and parallel to East Mill Plain Drive (Figure 2-3). A 1960-dated aerial photograph depicts a building remodel that changed the building layout to be similar to the present day layout (Figure 2-4). A 1970-dated aerial photograph depicts the Custom Care Cleaners tenant space having been expanded to the south, and much of the area currently occupied by Custom Care Cleaners is constructed (Figure 2-5). A small unenclosed area is visible on the southern portion of the space; this unenclosed area is also depicted on a circa-1991 building floor plan on file with the Clark County Assessor (Lane County, n.d.). The inset area was enclosed sometime after 2002. The 1970-dated aerial photograph also shows that the north/south-oriented strip mall building had been constructed by this time.

The earliest record of ownership for the onsite dry cleaning business is from 1987, when the business was owned by Ron Griffee and known as Griffey or Griffee's Cleaners (Stasch 1987; Ecology 1987). The business was sold to Mark Ickert in 1989 (the exact date is not known) and the name of the business was changed to Custom Care Cleaners (Ecology, n.d.).

The Park Hill Shopping Center property was purchased by the Memovich family in March of 1973. Based on notes in the County assessor's field folio, by 1991, the Lane County Tax Assessor was aware of the potential presence of contamination on/at the property (Lane County, n.d.). In December of 2004 (Lane County 2004), ownership of Park Hill Shopping Center was rolled into Park Hill Shopping Center, LLC, and Terry Phillips of the Phillips Group assumed property management responsibilities (Phillips 2013).

2.4 Operations and Waste Characteristics

In May 1987, the Washington State Department of Ecology (Ecology) issued a letter to Mr. Griffee, the business owner at the time, regarding proper disposal measures for sludges and a request that Mr. Griffee apply for a state/EPA Dangerous Waste Identification number (Stasch 1987). Mr. Griffee submitted a Notification of Dangerous Waste Activities form to Ecology on June 10, 1987. The form lists the dangerous wastes used as cleaning filters (10 annually) and



solvent sludge (100 gallons per year). No additional generator manifests were included with the form.

On December 19, 1989, Ecology conducted a hazardous waste inspection of the cleaning facility. The inspection report noted that the facility was using a still to purify spent "perc" (assumed to be perchloroethylene (PCE), a common dry cleaning solvent) and that residual water was being disposed of down a sink. The inspector informed the business owner (Mr. Ickert) that this practice should cease immediately and that the water should be added to the PCE sludge that was collected by Safety Kleen for disposal. Prior to the use of PCE in the cleaning process, the facility used Stoddard solvent. No information was available regarding when the process changed (Ecology, n.d.).

The Stoddard solvent equipment was stored in an unused room at the business. The inspector noted a pipe, which appeared to have been disconnected from the Stoddard equipment, passing through an exterior wall, and leading to a partially buried drum (Figure 2-6). The drum could not be opened by removing the top, so the inspector punctured the top of the drum to ascertain its contents. The drum was approximately half full of liquid and smelled like Stoddard solvent. The inspector informed Mr. Ickert that the contents would need to be disposed of properly (Ecology, n.d.).

On January 19, 1990 the inspector returned to the site, the contents of the drum were pumped into five 5-gallon containers for disposal, and a sample of the liquid was collected. After the drum was pumped out, approximately 11 holes were noted below the level of the removed liquid, and the inspector surmised the drum had been used as a disposal system. The inspector then dug around the drum, noted evidence of contaminated soil, and collected a soil sample from approximately 2.5 feet below ground surface (bgs). The inspection report states: "the laboratory results showed the material was likely Stoddard solvent" (Ecology, n.d.). The analytical report indicated the Stoddard was present at 129,353 parts per million (ppm). Volatile organic compounds (VOCs) detected in this sample included ethylbenzene, toluene, and xylene (Ecology 1990).

The inspector then directed Mr. Ickert to remove the drum from the ground, line the hole with plastic, and backfill the hole with gravel. The final note on the inspector's report indicates that the project would be referred to Ecology's cleanup program. Available Ecology files do not include any further information regarding a cleanup at the site (Ecology, n.d.).

With regard to the location of the drum, Ecology field notes provide little detail, and include only a non-scaled drawing depicting the "dry clean operation" as a rectangle from which an apparent pipe extended to a "buried drum." The drawing does not include a north arrow, does not show from what part of the dry cleaner the pipe extended, nor does it provide other geographic reference points.

During the site visit conducted by START in support of this SI on May 30, 2014, information provided by Mr. Ickert placed the Stoddard equipment, still,



discharge pipe, and drum on the southern side of the business. More specifically, the buried drum had been located in what was an unenclosed area inset into the southern side of the building (Figure 2-6). As will be discussed in Section 2.5, an underground storage tank (UST) was also present in this area.

2.4.1 Current Business Practices

Stoddard solvent is no longer used in the dry cleaning process at Custom Care Cleaners, and the facility has not used PCE since 2000 (Ickert 2013). Currently, the facility uses two types of "green" hydrocarbon-based dry-cleaning solvents, ExxonMobil Chemical product DF-2000, or EcoSolv produced by Chevron Phillips. Filters and sludges are removed on a regular basis and transported offsite for disposal by Safety Kleen (Ickert 2014).

2.4.2 Potential Sources

Stoddard solvent was reportedly discharged to the soil surrounding the buried drum at the site. Stoddard solvent is a widely used, man-made, organic solvent that results from the refining of crude oil. It is a petroleum mixture made from distilled alkanes, cycloalkanes (naphthenes), and aromatic compounds. It typically contains small percentages (i.e., <0.4%) of acenaphthene, naphthalene, acenaphthylene, and tricyclicoaromatics (ATSDR 1995).

Custom Care Cleaners has also been investigated in connection with PCE and related breakdown products historically detected in City of Vancouver municipal wells (Vancouver Water Station-4). As will be discussed in further detail in the following section, while PCE was detected at and proximal to Custom Care Cleaners, the concentrations encountered were well below those detected in the well field and, as such, Custom Care Cleaners was not considered a likely source of the impacts.

2.5 Previous Investigations

In addition to the hazardous waste inspection report in the Ecology file, during a conversation with the property manager and the owner of Custom Care Cleaners, it was revealed that extensive sampling work had occurred in the vicinity of the site. Upon reviewing existing information, the START learned that the Custom Care Cleaners property had been investigated in conjunction with EPA's characterization and remedial work for the Vancouver Water Station-4 NPL site. The Vancouver Water Station-4 well field is located downgradient and approximately 1 mile southwest of Custom Care Cleaners (Figure 2-1).

As a public water system, the Vancouver Water Station-4 wells were subject to regular sampling and testing to monitor drinking water quality. In the late 1980s, regulations for sampling and testing were changed to also require that water would be tested for VOCs. Testing for these constituents consistently detected PCE in ground water drawn from wells at Vancouver Water Station-4. PCE was also detected in another well field (Vancouver Water Station-1) in the city, though at lower relative concentrations (EPA 1999a).

In response to these findings, Vancouver Water Station-4 was temporarily taken offline in 1989, an air stripping system installed to remove PCE from the water, and preliminary investigatory tasks were implemented in an attempt to identify the PCE source. These preliminary steps included sampling private wells, surface water sources, and industrial sumps proximal to Vancouver Water Station-4 during that same year. After these steps, the study area was broadened to look at dry cleaning businesses north and upgradient of Vancouver Water Station-4, with further steps taken through 1992 that included sampling and testing of existing wells, newly installed monitoring wells, and soil gas. This work identified several dry cleaners as potential contamination sources, one of which being Custom Care Cleaners (EPA 1999a).

Specific to Custom Care Cleaners, soil gas survey work in this area conducted in 1992 identified PCE proximal to the business. The highest PCE soil gas level at the Custom Care Cleaners property was identified in a "pit" sample. Based on information obtained during this study, the pit sample appears to have been collected near the buried drum identified at the site by Ecology in 1989. Soil gas concentrations diminished to below detectable levels approximately 300 feet south of Custom Care Cleaners (EPA 1992). With respect to ground water, multiple samples were collected from downgradient monitoring wells, some of which were screened at multiple depths. Of these ground water samples, the highest PCE concentrations (23 µg/L and 8.6 µg/L) were detected in a shallow and deep well-pair (MW4-8S and MW4-8D) located approximately 350 feet southwest and cross- to down-gradient of Custom Care Cleaners. PCE concentrations in the intermediate depth well at this location (MW4-8I) were much lower, reaching a high of 1.1 µg/L (EPA 1999b). However, all of these concentrations were well below those detected in the Vancouver Water Station-4 study area drinking water wells (i.e., with concentrations ranging up to 1,600 μg/L in a private well). As such, Custom Care Cleaners was not considered a likely source of the PCE impacts to Vancouver Water Station-4.

More recently, in 2002, Steve Memovich, the previous property owner for Park Hill Shopping Center, engaged the services of Pacific Northern Environmental Corporation (PNE) to remove and permanently decommission three USTs at the Park Hill Shopping Center. These USTs included two 800-gallon USTs and one 1,000-gallon UST used to store heating oil (Figure 2-6). A copy of the UST decommissioning document prepared by PNE for Mr. Memovich is contained in Appendix A.

The two 800-gallon USTs were located directly north of the Custom Care Cleaners tenant space (PNE 2002). The two USTs appear to have been adjacent to one another and to have been removed from a single excavation. Apart from limited surface corrosion, both tanks appeared to be in good condition, free from holes, and no soil staining was noted during excavation. After removal, soil samples were collected from beneath the ends of both tanks, and a single soil sample was collected from the removal excavation stockpile (five samples total). All five samples were analyzed using Northwest Total Petroleum Hydrocarbon

(NWTPH) Hydrocarbon Identification (HCID) methodology. This analysis revealed no detectable gasoline, diesel, or heavy-oil range petroleum hydrocarbons in soils removed from this excavation (PNE 2002).

The 1,000-gallon UST was located on the south side of the Custom Care Cleaners tenant space, in the unenclosed area previously inset into the building (PNE 2002). Based on conversations with Mr. Ickert for this SI, it appears this UST removal excavation would have included the area where the Stoddard solvent discharge drum had been located, and both of these items would have been located beneath the present-day footprint of the building. After excavation and removal of the UST, five samples were collected from the excavation, including two from beneath both ends of the tank; two from stained soil on the northern and southern excavation sidewalls; and one from beneath a "leaking" sewer line that transected the east side of the removal excavation. Two additional samples were collected from the excavation stockpile. Soil staining was observed around the tank fill tube, along the top of the tank, and at the northern excavation sidewall (PNE 2002).

Following excavation, one soil stockpile sample was submitted for NWTPH-HCID analysis, which identified diesel and heavy-oil range petroleum hydrocarbons in the sample. Based on this result, all of the samples from the southern excavation and soil stockpile were analyzed for diesel and heavy-oil range petroleum using NWTPH-Diesel extended (Dx) methodology. In addition, both stockpile samples and the one sample collected from beneath the leaking sewer pipe were analyzed for VOCs by EPA Test Method 8260 (PNE 2002).

Analysis of these samples revealed the presence of diesel range petroleum in the samples collected from the northern excavation sidewall and the eastern margin of the excavation (beneath the sewer line). Both stockpile samples contained heavy-oil range petroleum. VOC analysis detected ten compounds above the analytical method reporting limits (MRL): n-butylbenzene, sec-butylbenzene, tert-butylbenzene, ethylbenzene, isopropylbenzene, p-isopropylbenzene, n-isopropylbenzene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and xylene. These analytes were below Ecology's Model Toxics Control Act Method A (MTCA A) cleanup levels. While no chlorinated VOCs were detected above the MRL, the accompanying laboratory report indicated PCE and cis-1,2-dichloroethene were present in the three samples, though the concentrations were below the MRL. Ground water was not encountered during UST decommissioning and/or excavation (PNE 2002).

In the context of the historic discharge of Stoddard solvent to the subsurface environment at the property, analysis of the southern stockpile sample by NWTPH-HCID analysis would have detected Stoddard solvent, if present, as a gasoline range hydrocarbon. As referenced above, the one soil sample from the southern UST stockpile did not have gasoline range petroleum hydrocarbon detections. In addition, VOC analysis of soil samples collected adjacent to the buried drum by Ecology in 1990 detected toluene, ethylbenzene, and xylene. While ethylbenzene and xylene were detected in the sample analyzed for VOCs at

the time of the southern UST removal, the concentrations were lower than what was detected in 1990.

2.6 START Site Visit

On May 30, 2014, a site visit of the Custom Care Cleaners site was conducted. During this time, photographs of site features were taken (Appendix B). Site visit attendees included:

- Derek Pulvino, E & E, Project Manager;
- Monica Tonel, EPA, Task Monitor;
- Greg Memovich, Member, Park Hill Shopping Center, LLC;
- Mary Thompson, Member, Park Hill Shopping Center, LLC;
- James G. D. Peale; Maul, Foster, Alongi, Consultant to Park Hill Shopping Center, LLC; and
- Mark Ickert, Owner, Custom Care Cleaners.

During the site visit, attendees discussed the known history of the Custom Care Cleaners tenant space and potential areas of concern, and investigated and observed development and construction features on and proximal to the business. At the time of the visit, the property was operating as a commercial dry cleaning business, and was easily accessed on foot. Property features are discussed further below:

- Custom Care Cleaners occupies the western tenant space within the Park Hill Shopping Center building (Appendix B, Photos 1 through 6). The retail entrance, sales counter, and alterations area are located in the northeast corner of the Custom Care Cleaners tenant space (Figure 2-6; Photo 7). The remainder of the business area is occupied by sorting, pressing, and cleaning equipment.
- The dry cleaning equipment is located in the southwest corner of Custom Care Cleaners, and includes three "Petro-Miser" brand machines (Photo 10). As previously discussed, Custom Care Cleaners currently uses DF-2000 or Ecosolv, both non-chlorinated, petroleum-based "green" dry cleaning solvents. Dry cleaning solvents are reclaimed by an attached still and carbon canister system located on the south side of the dry cleaning equipment (Photo 11). Several patches were observed on the exterior building wall behind these machines (Photo 18). All other machines in this area were standard washing machines that use soap and water. Filter containers, dry cleaning solvent drums, and other related supplies were located to the east of the dry cleaning machines (Photo 12). A variety of spot-cleaners were stored on a shelf, located adjacent to these containers. According to Mr. Ickert, the previously used dry cleaning equipment had also been located in this area.



- Steam clothing presses are situated in the center of the Custom Care Cleaners building (Photo 8). Overhead steam lines were observed in this and other areas of the building, connecting to this equipment. Two water heaters and a boiler room with an outside access door were located on the southeast corner of Custom Care Cleaners (Photo 9).
- Exterior patching was observed on the southern and western concrete masonry unit (CMU) exterior walls of the building. According to Mr. Ickert, dryers had previously vented through these holes (Photo 16).
- The south-central portion of the Custom Care Cleaners space was used to store boxes of business-related supplies, such as clothes hangers, filters, and plastic bags. As previously discussed, Mr. Ickert reported that upon his occupancy of the building, building walls had been oriented differently, and a portion of this storage area had been outdoors. The former extent of the walls is identifiable within the building by the cut CMU blocks on the north and south walls, and on the outside of the building by the slightly altered orientation and finish of adjacent CMU blocks (Photos 13 through 17). This old construction feature is further documented in Assessor records, which include a circa-1991 plan-view building drawing that depicts this area outside of the building.
- Further, according to Mr. Ickert, the previously used Stoddard still and related equipment observed by Ecology had been located on the southern side of Custom Care Cleaners. A discharge pipe that had apparently been connected to the still ran through the wall to the buried drum located in the outdoor area, to which waste fluid had been discharged. As previously discussed, this was also the location where a 1,000-gallon heating-oil UST had been removed. According to Mr. Ickert, a plastic sewer cap set within the concrete approximately coincides with the previous location of the buried drum (Photo 15).

Migration/Exposure Pathways

This section describes the migration/exposure pathways and potential targets within the site's range of influence.

3.1 Ground Water Migration Pathway

The target distance limit (TDL) for the ground water migration pathway is a 4-mile radius that extends from the sources at the site. Figure 3-1 depicts the ground water 4-mile TDL.

3.1.1 Geologic Setting

Custom Care Cleaners is located in the Portland Basin Geologic area, which is surrounded by the Cascade Mountains to the east and the Coast Range to the west, with the Columbia River flowing through it, separating the states of Washington and Oregon (Korney 2000; Mundorff 1964). This low land basin consists of broad, relatively flat flood plain terraces rising approximately 800 feet above sea level from the Columbia River to the foothills northeast of Vancouver (Mundorff 1964). At depth, Miocene age and older volcanic lava flows formed the Columbia River Basalt Group, which is overlain by sedimentary deposits estimated at up to 1,400 feet thick (Korney 2000).

The base of the sedimentary deposits is the Sandy River Mudstone, consisting of 400 to 600 feet of siltstone and claystone. The Troutdale Formation is of Miocene to Pliocene age, and it unconformably overlies the Sandy River Mudstone with fluvial deposits up to 1,000 feet thick. The Troutdale Formation is composed of coarse-grained sand and gravel deposits separated by layers of fine-grained silt, siltstone, and sand, all of which are a result of the erosion of basalt deposits from the Cascade Range and Cascade Plateau volcanic events (Korney 2000). This formation dips towards the center of the basin, with a change of elevation over 500 feet from the eastern perimeter to the center (Korney 2000). The Troutdale Formation includes an Upper and Lower Troutdale member. The Upper Troutdale member has been weathered in areas, but is estimated to have been 300 to 400 feet thick originally. The Lower Troutdale member's maximum thickness is estimated to be 660 feet (Mundorff 1964). Overlying the Troutdale Formation are Quaternary alluvial silt, sand, and gravel deposits (Korney 2000).

The average total annual precipitation for the area is 39.62 inches, as measured from Vancouver, Washington (WRCC 2013).



3.1.2 Aguifer System

There are three primary aquifer systems within the sedimentary deposits of the Portland Basin: an upper sedimentary aquifer system, a deeper/lower sedimentary aquifer system, and older rocks. The upper aquifer system is separated by the Columbia River. On the Washington state side of the basin, in the area between the mouth of the Columbia River Gorge and the confluence of the Columbia River and Willamette River, both the upper and lower aquifer systems are composed of multiple aquifers.

The upper sedimentary aguifer system, also known as the Undifferentiated Gravel aquifer, is separated by the Columbia River. The Undifferentiated Gravel aquifer system consists of up to 400 feet of material. In Washington, this aquifer includes the Sand and Gravel aguifer, Orchards aguifer, and Troutdale Gravel aguifer (Korney 2000). The Sand and Gravel aguifer and Orchards aguifer primarily consist of flood deposits of late Pleistocene age, varying from bouldery gravel to silt. These include flood plain and terrace deposits along major tributaries and glacial outwash in some areas. The top of the unit is land surface and is generally between 50 and 100 feet thick, although deposits range up to 400 feet thick in some areas. Wells completed in these deposits have maximum yields between 1,000 and 6,000 gallons per minute near Washougal, Camas, and Vancouver, Washington, and up to 10,000 gallons per minute north of Blue Lake in Oregon (Swanson et al. 1993). The Troutdale Gravel aquifer principally consists of sandy gravel, silty sand, sand, and clay. The altitude of the top of the unit ranges from about 700 feet above mean sea level in Camas, Washington, to minus 600 feet above mean sea level northwest of Gresham, Oregon. The maximum thickness of this unit is about 800 feet, and well yields are as large as 3,000 gallons per minute in some areas (Swanson et al. 1993).

In Washington, the deeper/lower sedimentary aquifer system includes two confining units and two aquifer units—the Troutdale Sandstone, and sand and gravel beds—within the Sandy River Mudstone geologic unit (Korney 2000). The upper confining unit consist of a grayish olive-green clay and silt with lenses of silt and fine- to medium-grained sand and generally is less than 200 feet thick. The upper confining unit separates the Troutdale Gravel aquifer from the Troutdale Sandstone aquifer. The lower confining unit is lithologically similar to the upper confining unit. The thickness of the lower unit ranges from about 200 feet in the southeastern part of the basin to about 800 feet toward the center of the basin (Swanson et al. 1993). The lower confining aquifer separates the Troutdale Sandstone aquifer from the Sands and Gravel aquifer.

The Troutdale Sandstone aquifer consists of coarse sandstone and conglomerate, with lenses and beds of fine- to medium-grained sand and silts. The altitude of the top of the aquifer is about 1,000 feet in the area east of the Sandy River and dips westward to about minus 400 feet near downtown Portland. The thickness of the aquifer ranges from 100 to 200 feet, but reaches about 400 feet in the southeastern part of the basin. Wells completed in this unit yield up to 2,500 gallons per minute (Swanson et al. 1993).



The older rock unit includes generally low permeability Miocene and older volcanic and marine sedimentary rock that underlies and bounds the basin-filling sediments. The altitude of the top of the unit ranges from land surface in the exposed areas to minus 1,600 feet above mean sea level beneath Vancouver, Washington (Swanson et al. 1993).

Hydraulic Conductivity

The four sedimentary aquifers in the basin have the highest median hydraulic conductivities. The Upper Sedimentary aquifer system has the highest median value of hydraulic conductivity (200 feet per day) and also the greatest variation in values (0.03 to 70,000 feet per day). It is the most permeable aquifer, as well as the most heterogeneous unit. The Troutdale Gravel aquifer, Troutdale Sandstone aquifer, and Sand and Gravel aquifer all have similar median values of about 7 to 16 feet per day. The Troutdale Sandstone and the Sand and Gravel aquifers have low variation in hydraulic conductivity relative to some of the other units. The Troutdale Gravel aquifer, however, has values of hydraulic conductivity ranging over six orders of magnitude (McFarland and Morgan 1996).

Sole Source Aquifer Designation

The EPA established a sole source aquifer program authorized under Section 1424(e) of the Safe Drinking Water Act of 1974 (Public Law 93-523, 42 U.S.C. 300 et seq.). A sole source aquifer is defined as one that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. In addition, the aquifer can have no alternative drinking water source(s) that could physically, legally, and economically supply all those who depend upon it for drinking water. The Troutdale Sole Source Aquifer System, E6-14710, was established on October 5, 2006. This aquifer system provides approximately 99 percent of the drinking water available to the people living in an area that encompasses approximately half of Clark County, including Vancouver, Washington. The aquifer system is up to 2,000 feet thick in some areas (EPA 2006).

3.1.3 Drinking Water Targets

Approximately 170,132 people use ground water for drinking water purposes within the 4-mile TDL. A combination of domestic wells and Group A and Group B community water systems are present. Washington Administrative Code (WAC) defines the group designation for community water systems. The definitions, as provided by the Washington State Department of Health (DOH), are:

■ **Group A:** (WAC 246-290). Group A water systems are those with 15 or more service connections, regardless of the number of people; or systems serving an average of 25 or more people per day for 60 or more days within a calendar year, regardless of the number of service connections. Group A water systems do not include systems serving fewer than 15 single-family residences, regardless of the number of people.



■ Group B: (WAC 246-291). Group B water systems serve less than 15 residential connections and less than 25 people per day; or 25 or more people per day fewer than 60 days per year. Group B water systems are those public water systems that do not meet the definition of a Group A water system.

DOH maintains records of all active public water systems. Public water systems, regardless of group designation, indicate the total number of wells in the system, distribution capacity, number of connections, and total population served. A search of the DOH Sentry Internet database revealed the presence of 50 Group A community wells serving a total population of 167,786 people within the 4-mile TDL, and 27 Group B community wells serving a total population of 117 people within the 4-mile TDL (DOH 2012).

Clark Public Utilities maintains 39 wells (30 permanent, five emergency, and four seasonal) as part of its Group A community system, which serves a total population of 82,123 people. The emergency and seasonal wells are regularly maintained to augment the drinking water supply. The water is blended prior to distribution, and no single well provides more than 40 percent of the total capacity. Based on this information, it is estimated that each well serves approximately 2,106 people (i.e., 82,123 people / 39 wells). Of the 39 wells in this system, six permanent and one seasonal fall within the 4-mile TDL. Well locations are provided as township, range, and section. Therefore, the population assigned to each well and distance ring was apportioned based on the percentage of each well's section location that fell within a given distance. Apportionment of the population by distance ring is provided in Table 3-1.

Golden West Mobile Manor maintains three permanent wells as part of its Group A community system, which serves a total population of 300 people. All three of the wells are located within the 3- to 4-mile distance ring.

The City of Vancouver maintains a system of 40 permanent wells as part of its Group A community system, which serves a total population of 188,307 people. The water is blended prior to distribution, and no single well provides more than 40 percent of the total capacity. Based on this information, it is estimated that each well serves approximately 4,708 people (i.e., 188,307 people / 40 wells). All 40 of the wells are located within the 4-mile TDL. Well locations are provided as township, range, and section. Therefore, the population assigned to each well and distance ring was apportioned based on the percentage of each well's section location that fell within a given distance. Apportionment of the population by distance ring is provided in Table 3-1.

Domestic well logs are maintained by Ecology. A search of the internet database revealed the presence of 309 domestic wells within the 4-mile TDL (Ecology 2012). The number of people served by each well is not known; therefore, the average number of persons per household for Clark County, Washington (2.65) was utilized to determine well populations (USCB 2012). Based on this information, it is estimated that approximately 819 people are served by domestic

ground water wells (i.e., 309 wells x 2.65 people per well). The number of persons served by ground water by distance ring is presented in Table 3-1.

Well logs were noted during the search of Ecology's well log database (Ecology 2012). Based on the primarily residential and light industrial land uses within the 4-mile TDL, it is not assumed that ground water is used for the irrigation of 5 or more acres of commercial food crops or commercial forage crops, watering of commercial livestock, as an ingredient in commercial food preparation, as a supply for commercial aquaculture, or as a supply for a major or designated water recreation area.

The site is not located within a wellhead protection area; however, wellhead protection areas are present within the 4-mile TDL (DOH 2012).

3.2 Surface Water Migration Pathway

The surface water migration pathway TDL begins at the probable point of entry of surface water runoff from the site to a surface water body and extends downstream for 15 miles.

Storm water runoff at the site flows over the pavement into catch basins which flow through a sewer system to a publicly owned treatment plant. The water is not discharged to any surface water body. Based on this information, the surface water migration pathway is not evaluated as part of this SI.

3.3 Soil Exposure Pathway

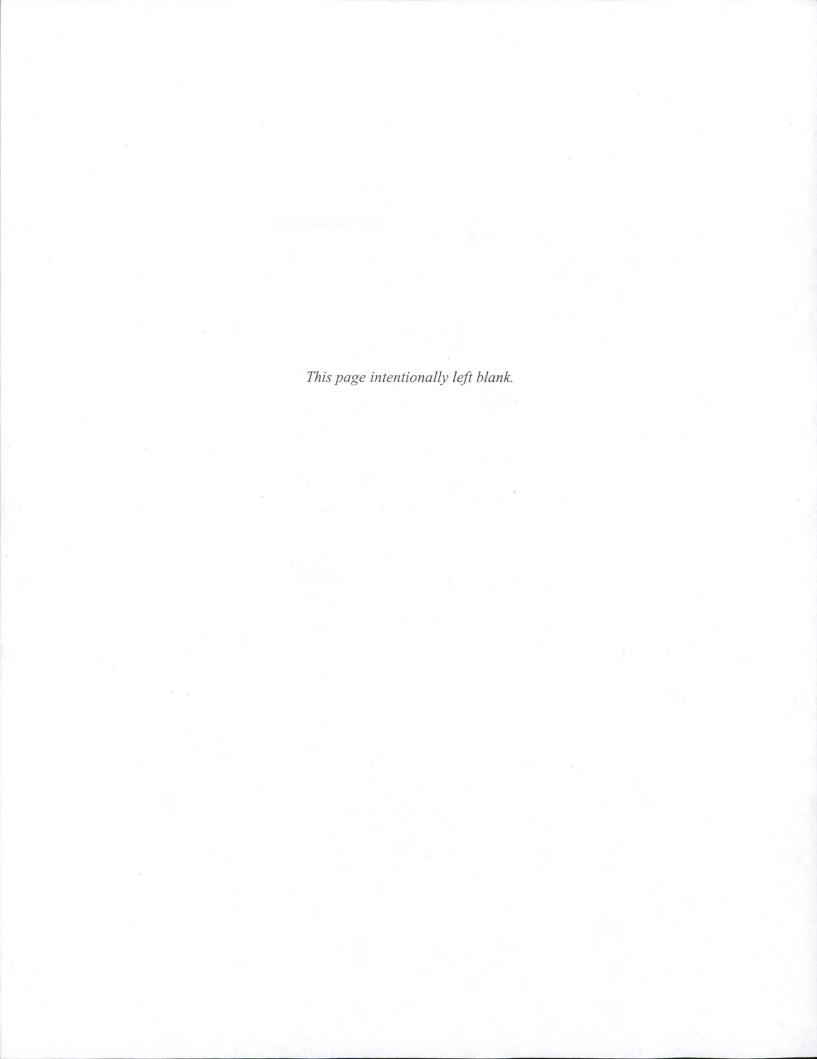
The soil exposure pathway is evaluated based on the threat to residents and nearby populations from soil contamination within the first 2 feet of the surface.

The site is partially paved with asphalt. The site is not fenced, nor is it used for any recreational purposes. Additionally, while soil contamination has been encountered on the property, remediation work has included the excavation and offsite treatment of impacted soil, with the remedial excavations covered with asphalt or concrete. Based on this information, the soil exposure pathway is not evaluated as part of this SI.

3.4 Air Migration Pathway

The air migration pathway is evaluated based on the threat to individuals, nearby populations, resources, and sensitive environments from a release or potential release of a hazardous substance to the atmosphere.

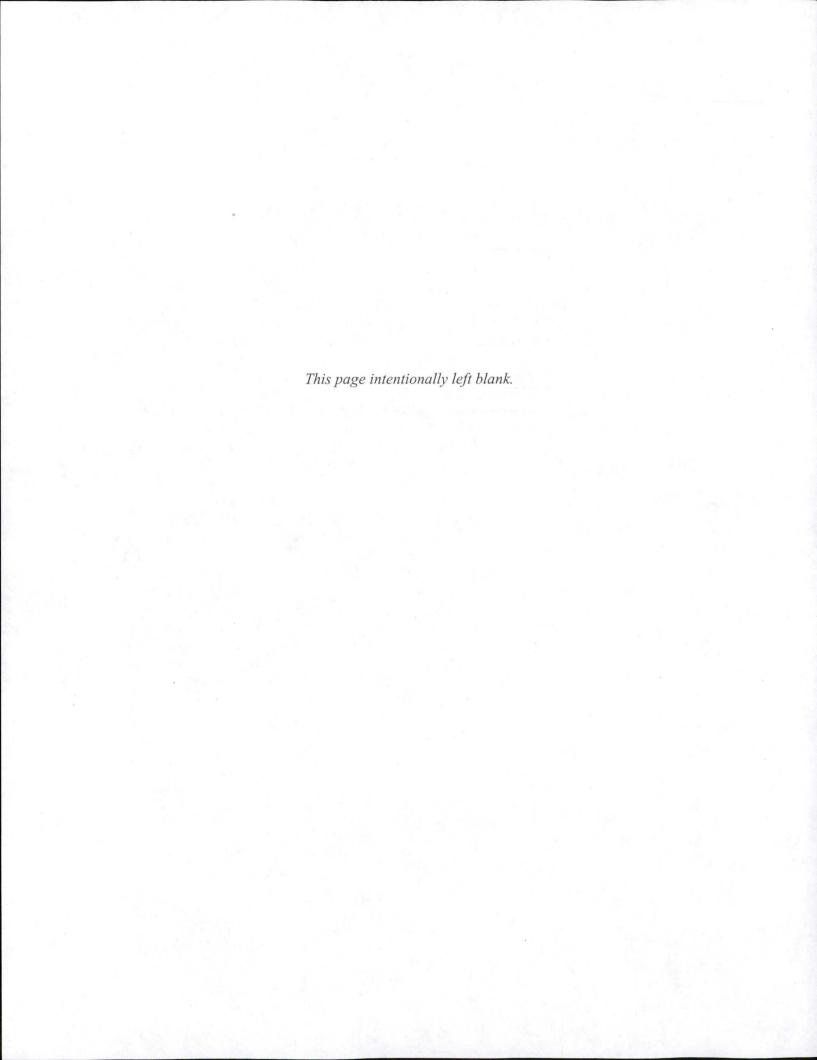
While soil contamination has been encountered on the property, remediation work has included the excavation and offsite treatment of impacted soil, with the remedial excavations covered with asphalt or concrete. Based on this information, the air migration pathway is not evaluated as part of this SI.



Summary and Conclusions

Custom Care Cleaners is a dry cleaning facility that has been in operation since at least 1987. The facility has used at least three types of cleaning solutions, including Stoddard solvent, PCE, and two brands of hydrocarbon based "green" dry-cleaning solvents (DF-2000 and EcoSolv). Previous inspections have documented the improper disposal of Stoddard solvent through a perforated buried drum, resulting in soil contamination. While subsurface impacts by PCE have also been documented at and proximal to Custom Care Cleaners, those impacts were investigated as part of the Vancouver Water Station-4 NPL site. A review of existing records for the Vancouver Water Station-4 site indicates that Custom Care Cleaners was not considered a likely source of PCE contamination to the Vancouver Water Station-4 site.

Given the above, Stoddard solvent was the primary contaminant of concern for this SI. While the buried drum had reportedly been removed and the area backfilled, no subsurface environmental characterization data or documentation is available directly documenting such removal activities. That said, a UST was subsequently removed from the vicinity of the buried drum. Based on the limited soil sampling data pertinent to Stoddard Solvent generated during UST removal, Stoddard solvent impacts (if any) that may remain in this area appear to be of relatively small scale, and Stoddard solvent-related impacts have not been encountered in proximal drinking water wells. Additionally, chlorinated compounds, including PCE, were not detected above method detection limits in the UST excavation. Based on these findings, no further action under CERCLA is recommended at the Custom Care Cleaners site.



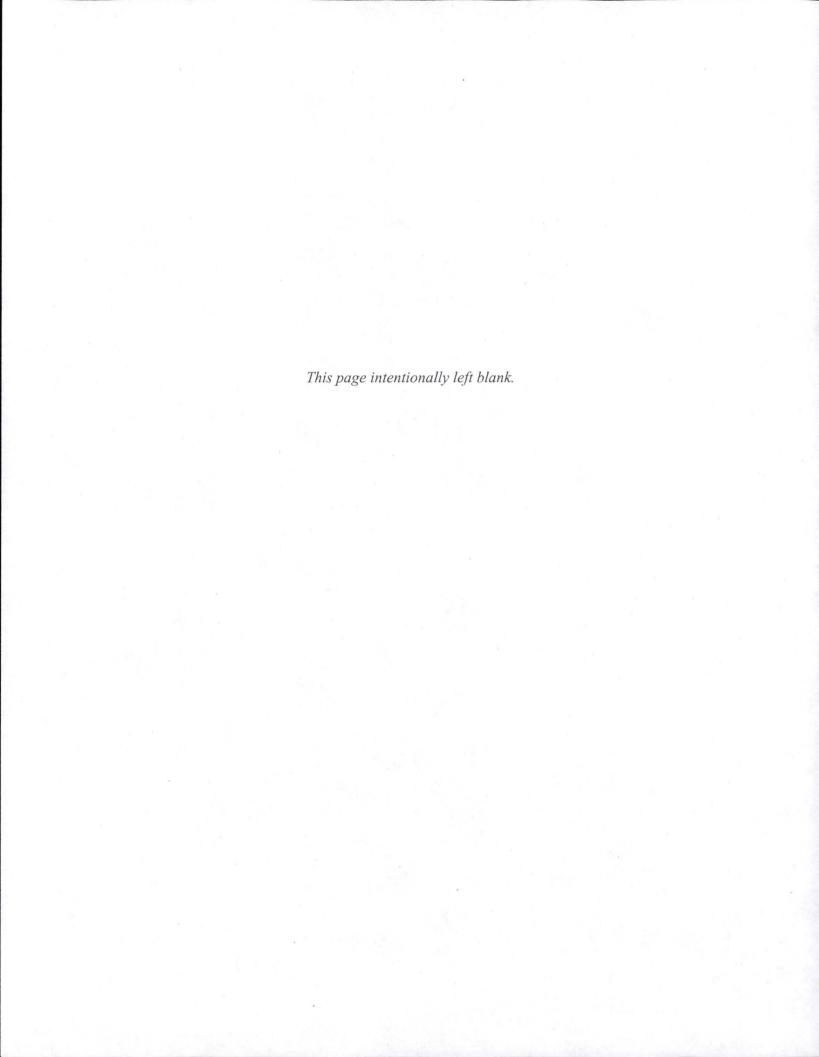
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Tables

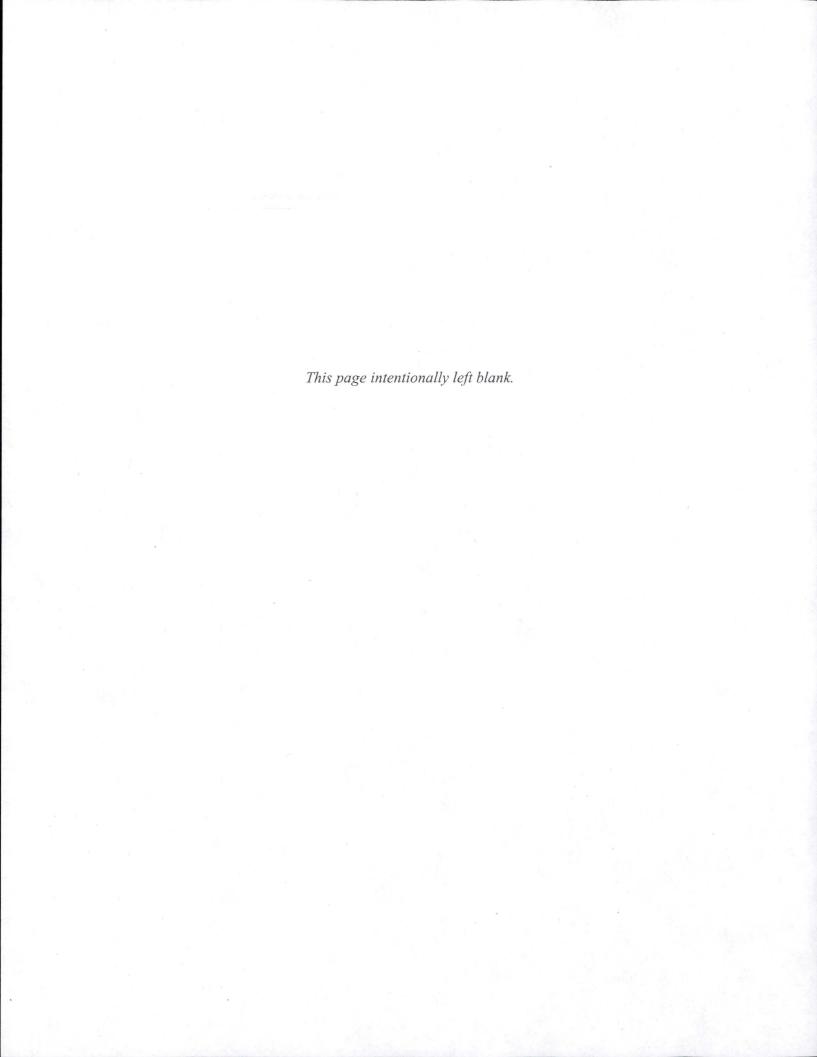
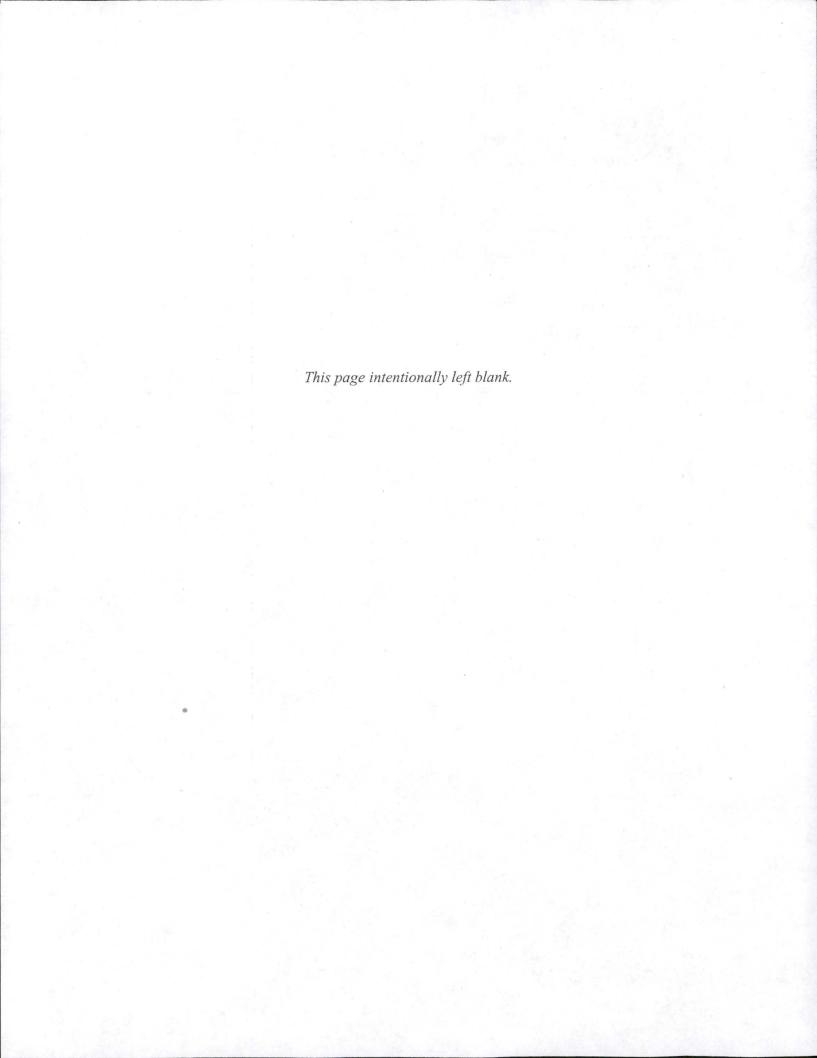
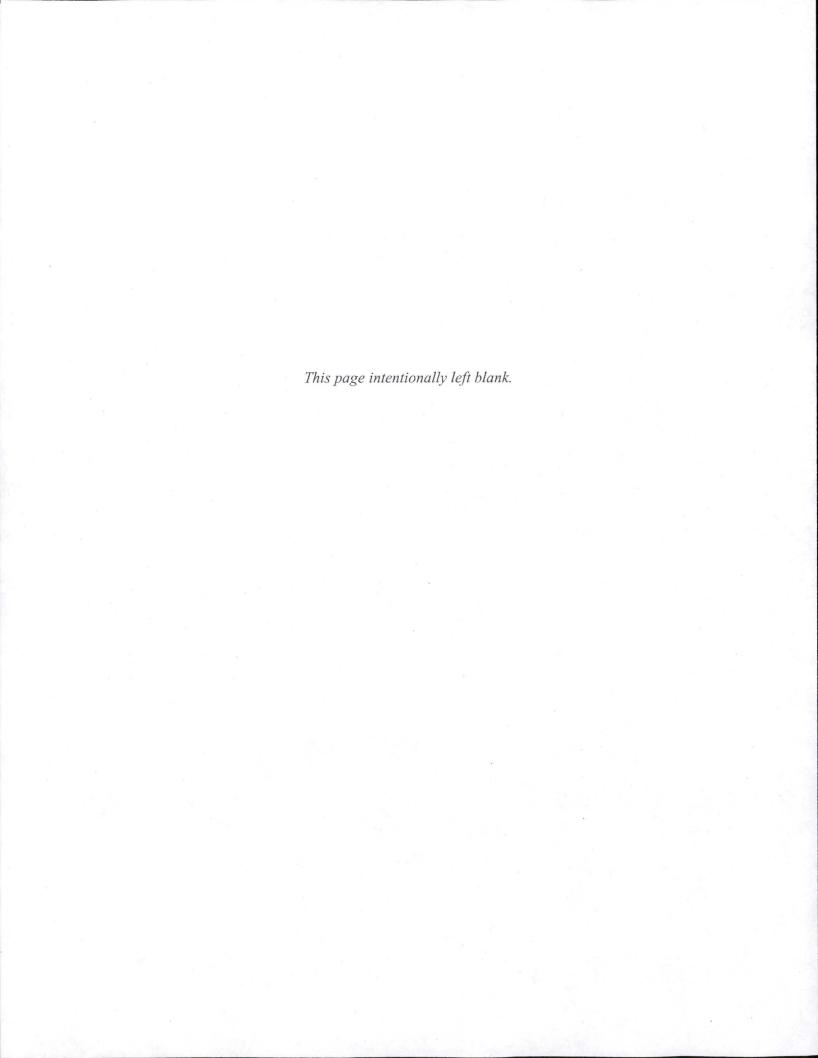


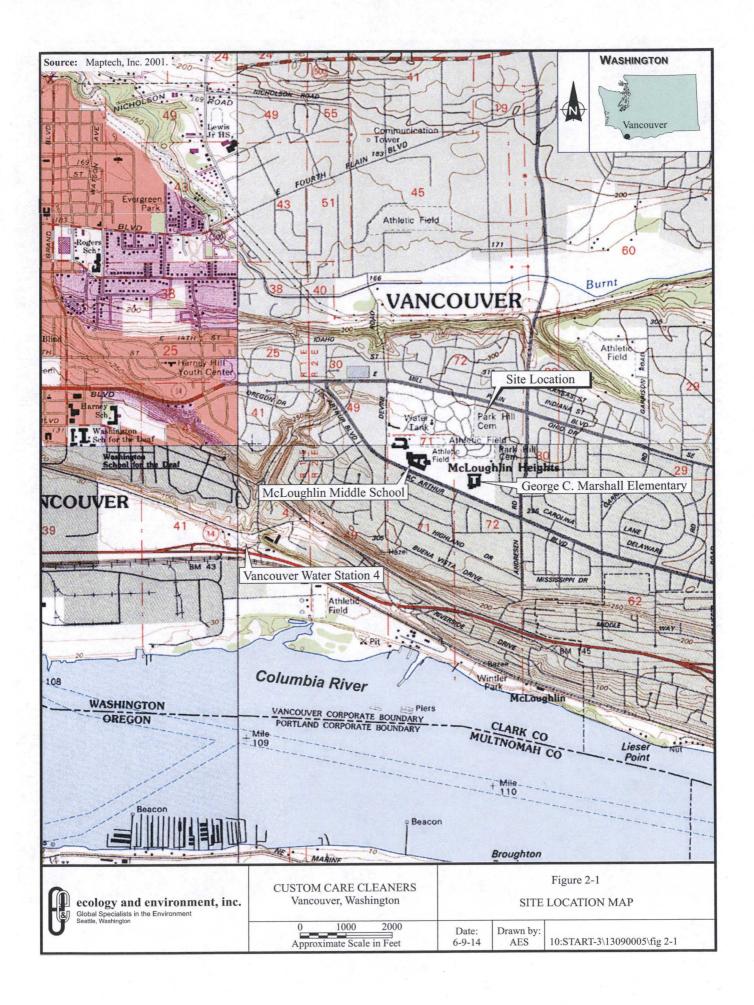
Table 3-1 Ground Water Drinking Water Population by Distance Ring

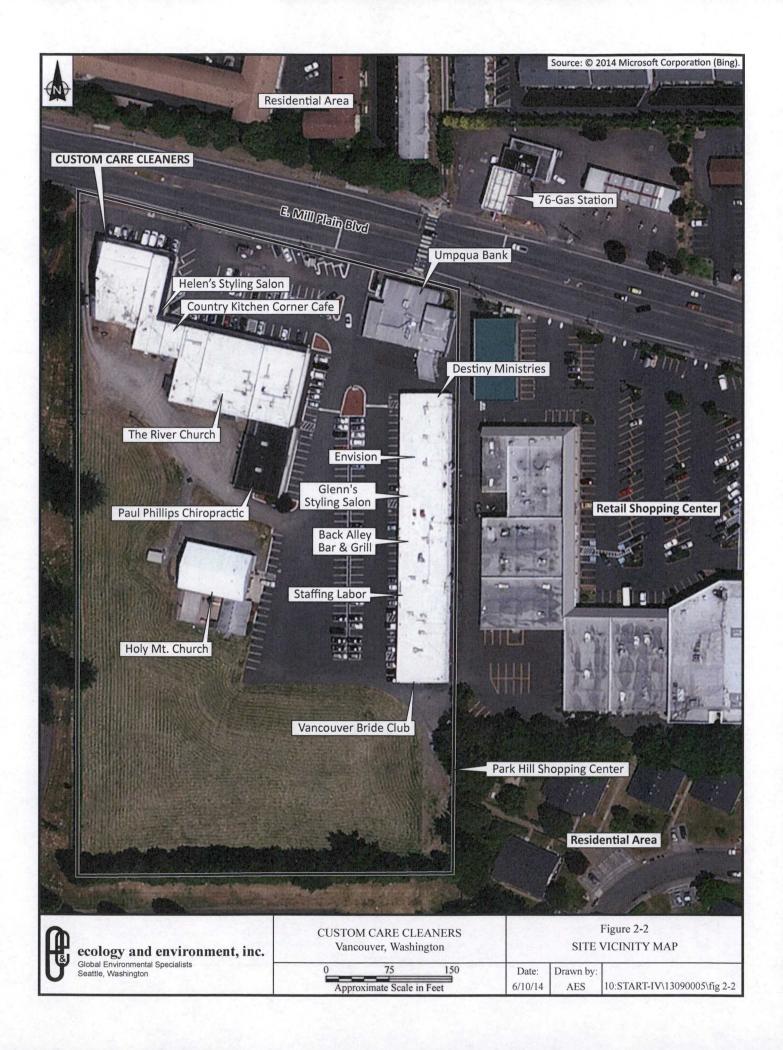
Distance Ring	Type of Well	Well Population	Total Population for Distance Ring
0 to ¼ mile	None	0	0
¹/₄ to ¹/₂ mile	Type A Community	1,410	1,410
½ to 1 mile	Type A Community	26,362	26,391
	Domestic	29	
1 to 2 miles	Type A Community	34,694	34,863
	Type B Community	. 13	
	Domestic	156	
2 to 3 miles	Type A Community	71,505	71,816
	Type B Community	35	
	Domestic	276	
3 to 4 miles	Type A Community	35,225	35,652
	Type B Community	69	
	Domestic	358	
200	170,132		

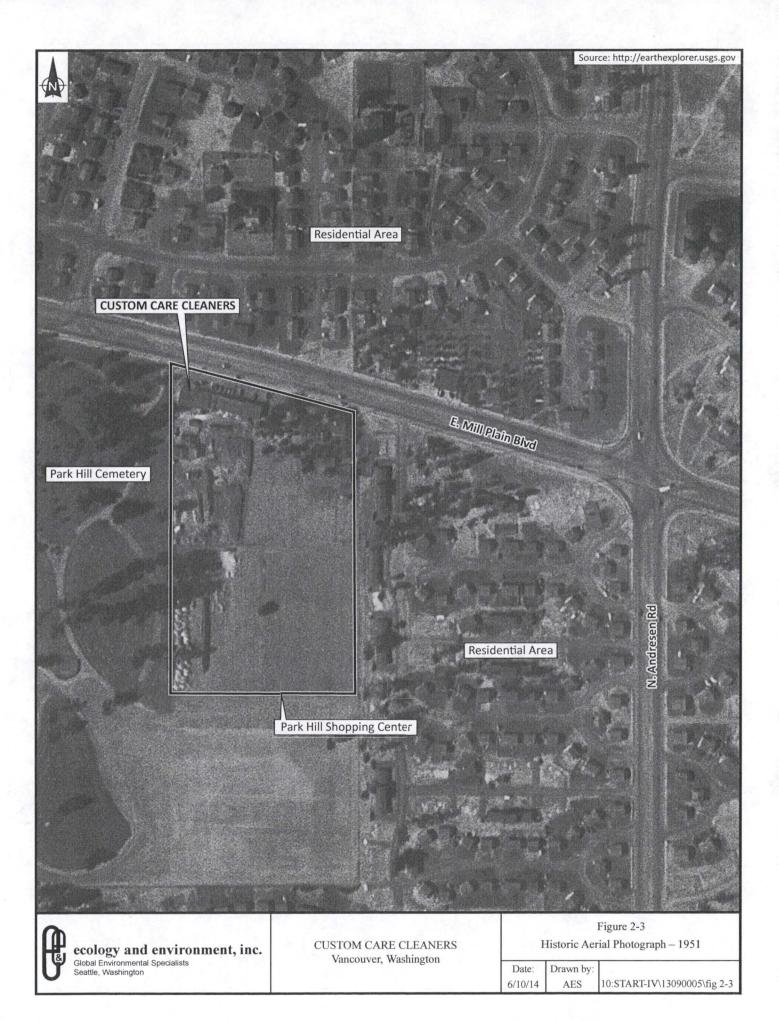


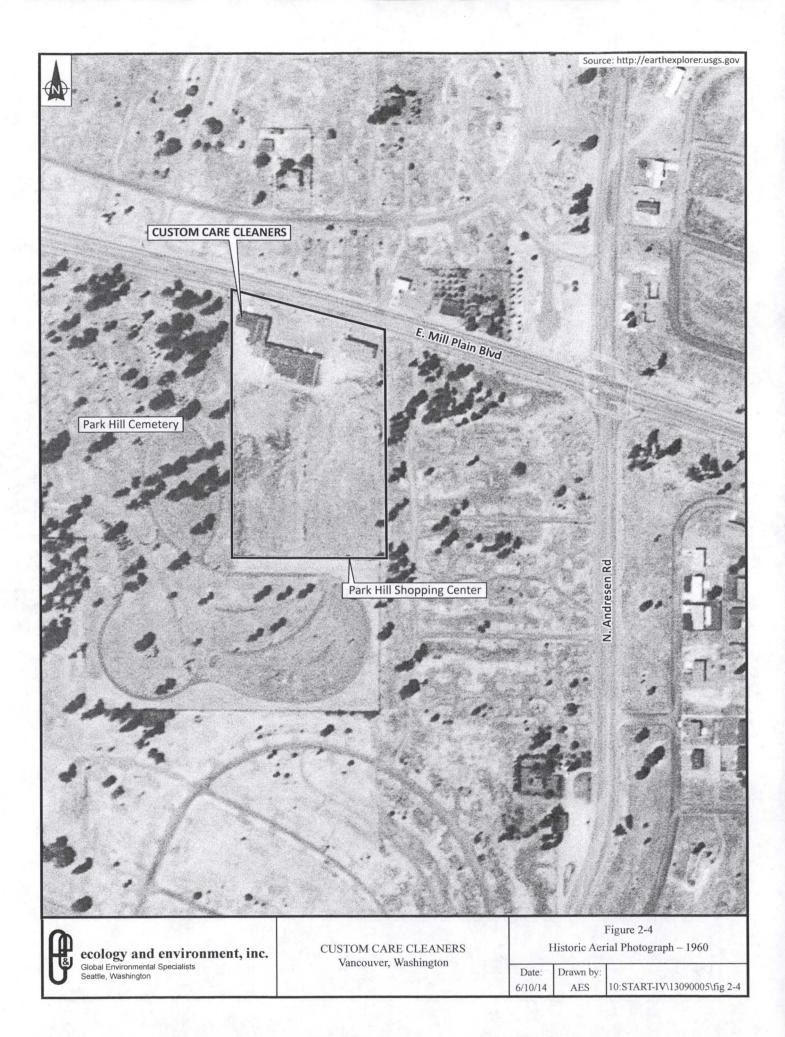
Figures









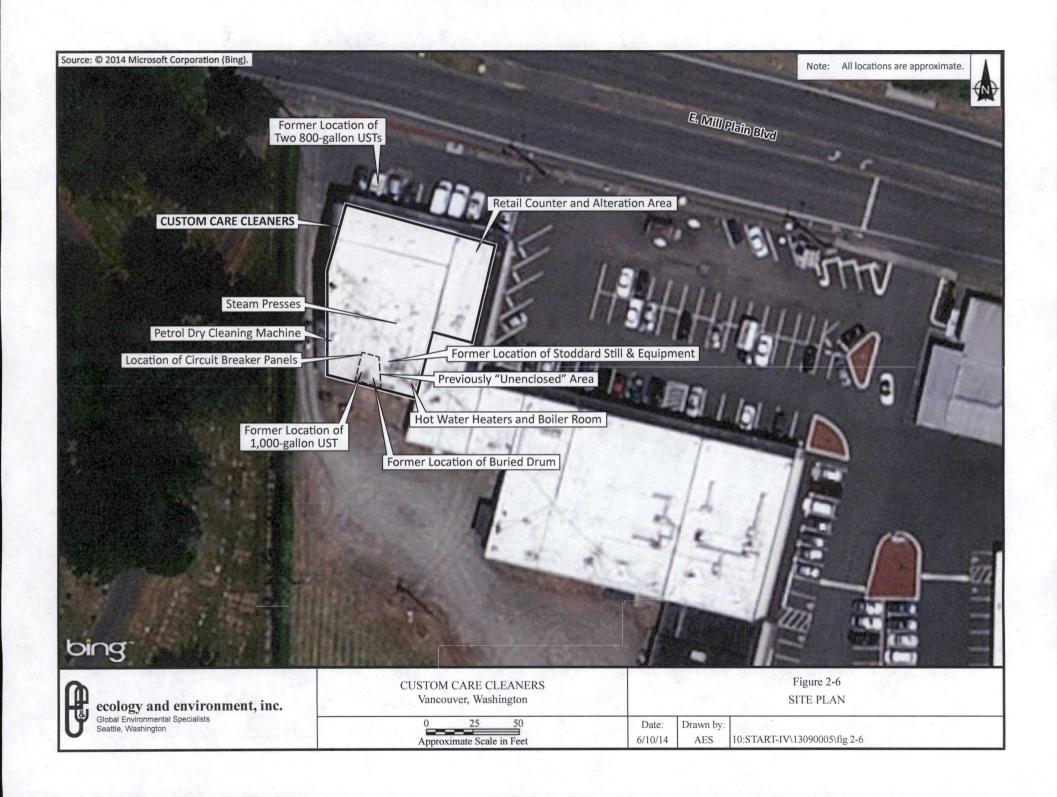


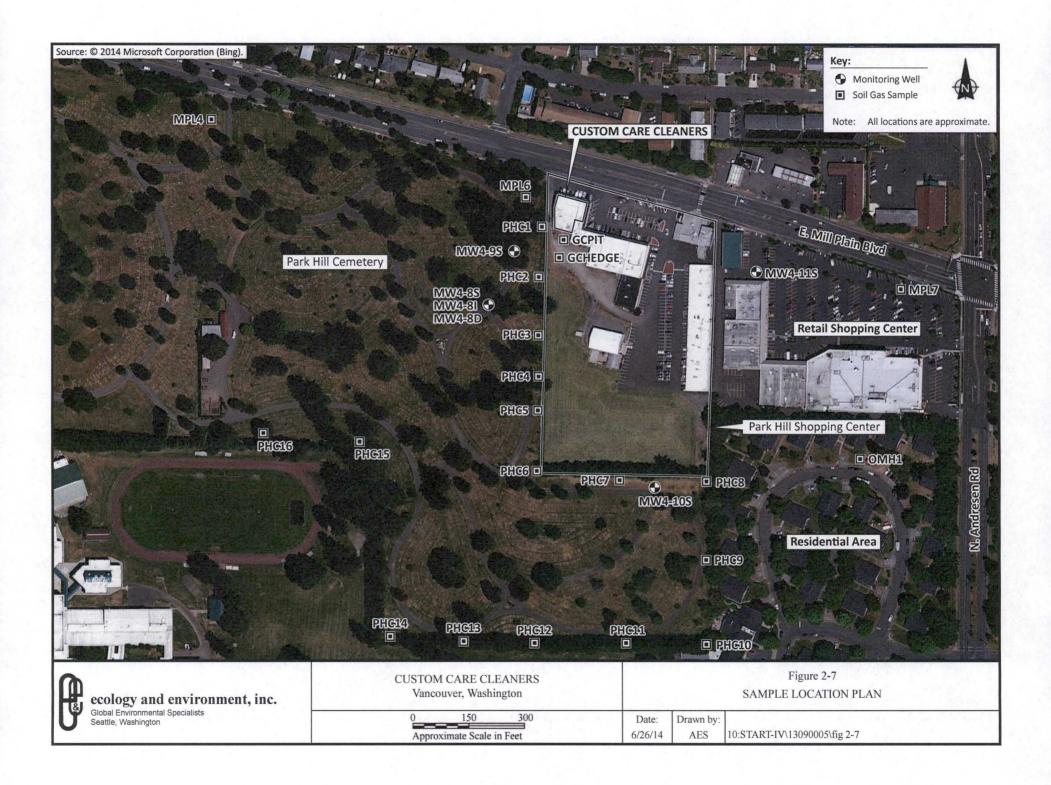


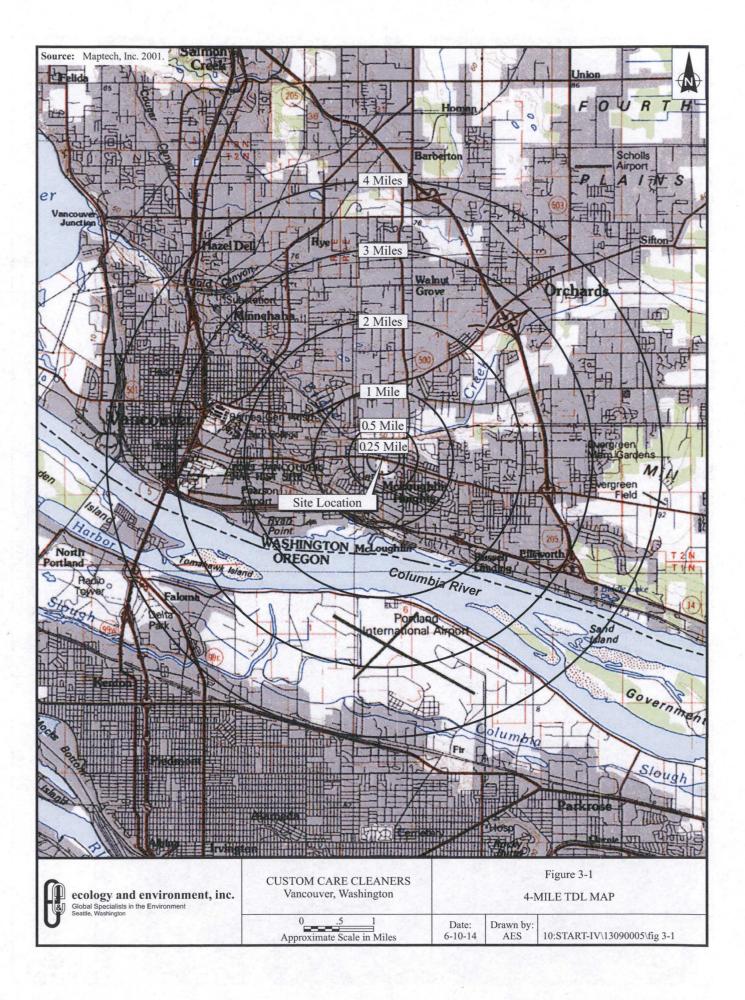
ecology and environment, inc.
Global Environmental Specialists
Seattle, Washington

Vancouver, Washington

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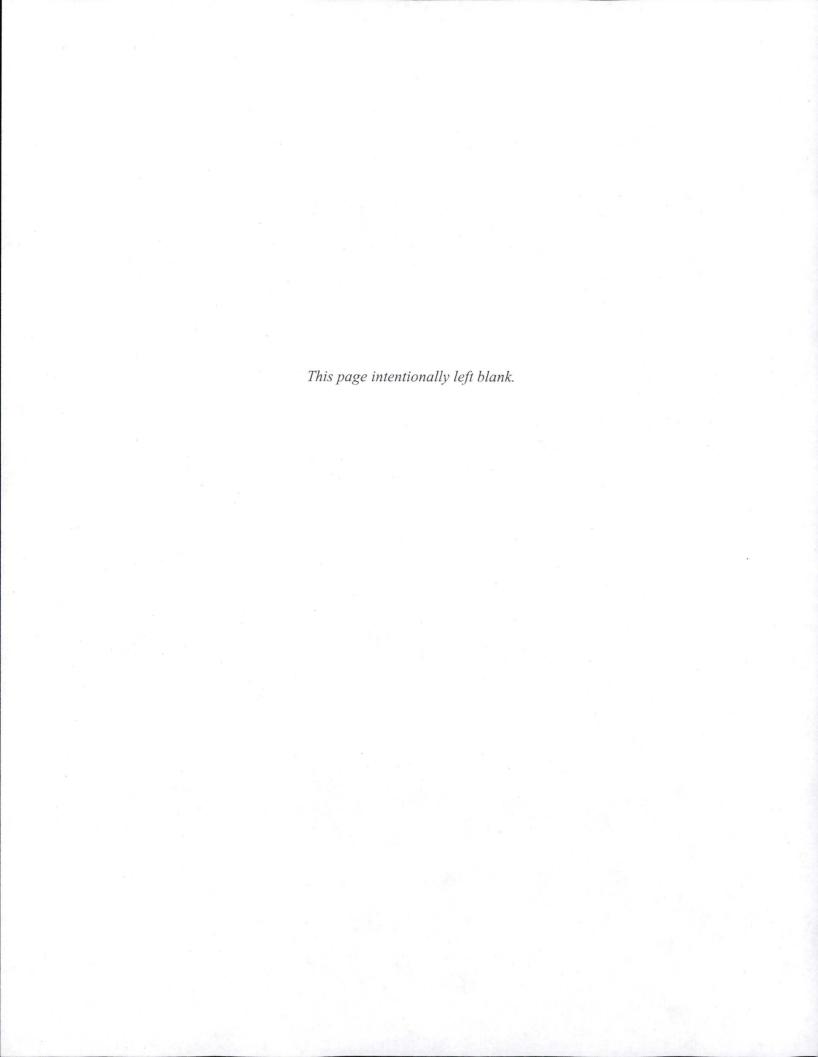








UST Decommissioning Document





CORPORATE OFFICE

1081 Columbia Blvd., Longview, WA 98632 • (360) 423-2245 • Fax (360) 423-2272 • Toil Free 1-800-533-2867 • www.pnecorp.com
February 19, 2002

Mr. Steve Memovich 3505 Northeast Royal Oaks Drive Vancouver, Washington 98662

RE: Heating Oil UST Decommissioning

Park Hill Shopping Center 6400 East Mill Plain Boulevard Vancouver, Washington 99661

Dear Mr. Memovich:

Pacific Northern Environmental Corp. (PNE Corp.) has prepared this letter report to document the permanent decommissioning of one 800-gallon and two 1,000-gallon heating oil underground storage tanks (USTs) located at the referenced facility (see Figure 1). These tasks were performed consistent with requirements specified in Chapter 173-360 of the Washington Administrative Codes, Divisions 385 and 390.

UST Decommissioning

Each heating oil UST was permanently decommissioned and removed on January 16, 2002, consistent with procedures contained in the American Petroleum Institute guidance document Recommended Practice 1604. Cowlitz Clean Sweep (CCS) of Longview, Washington triple-rinsed each UST using a pressure washer and vacuum truck prior to removal. CCS then transported the rinse water and residue removed from inside the UST to Oil Re-Refining of Portland, Oregon. The associated disposal receipts are attached in Appendix A.

South UST

One 1,000-gallon UST was removed from the subsurface near the south side of the current dry cleaner business. Soil staining was observed around the fill tube, along the top of the UST and near the north side wall of the excavation. Petroleum odors were also observed. Groundwater was not observed within the excavation.

The UST was inspected for signs of damage. There was corrosion of the UST surface, but no indication of holes, cracks or evidence of poor structural integrity. However the UST appeared to be stained by petroleum product. Photographs of the USTs subsequent to removal are presented in Appendix B.

Park Hill Closure Report

Project No. 4-2-001

PUGET SOUND OFFICE 4305 Lacey Blvd. SE, Suite 20 · Lacey, WA 98503 · Phone (360) 493-1960 · Fax (360) 493-1917

North USTs

Two 800-gallon USTs were removed from the subsurface near the south side of the current dry cleaner business. The USTs were inspected for signs of damage. There was little corrosion of the UST's surfaces, and no indication of holes, cracks or evidence of poor structural integrity. No leaks, cracks or holes were observed in the fill tube or furnace supply lines. The soil in the bottom and in the side-walls of the excavation resulting from removal of the USTs was also inspected, as was the stockpile created by removal of the UST's overburden soil. No stained soils were observed. No hydrocarbon odors were observed. Groundwater was not observed within the excavation.

Each of the USTs discussed above was cut open on January 18, 2002. Each UST was then transported to Bob Partridge Metals Recycling of Portland, Oregon for recycling. A copy of the associated disposal receipt is attached in Appendix C.

Impacted Soil Removal

In an attempt to remove petroleum-impacted soil from the site, PNE Corp. excavated additional soil from the excavation created during the removal of the south UST. The soil was stockpiled on and covered with 6-mil polyethylene sheeting pending characterization. Approximately 47 cubic yards of potentially impacted soil was removed.

Soil Sample Collection

Soil sample collection and chain-of-custody procedures were performed consistent with protocol outlined in the Washington Department of Ecology (Ecology) guidance document *Guidance for Remediation of Petroleum Contaminated Soils*. Soil sample locations are presented in Figure 2.

South UST

Five soil samples were collected from the south UST excavation:

- soil samples (B2-011701 & B3-011701) from each end of the former UST location in native soil, approximately 6 inches below the bottom of the UST
- two soil samples (B1-011701 & B4-011701) from stained areas of the excavation side walls and;
- one soil sample (B5-011701) from soil located directly beneath a leaking sewer pipe that is located directly beneath the adjacent dry cleaning facility.

In addition, two soil samples (BS1-011701 & BS2-011701) were collected from the associated soil stockpile.

One soil sample (BS1-011701) was analyzed using northwest chemical analytical method NWTPH-HCID. Based upon the analytical laboratory report, each soil sample was analyzed for diesel and heavy oil using northwest chemical analytical method NWTPH-Dx. The soil samples collected from beneath the leaking sewer pipe and from the soil stockpile were also analyzed for volatile organics using U.S. EPA Method 8260.

Laboratory reports indicate elevated concentrations of diesel, heavy oil and volatile organics. However, these concentrations do not exceed respective Method A cleanup Levels for soil as outlined in the Ecology's Model Toxics Control Act 173-340 WAC. Soil sample analytical results are summarized in Table 1. A copy of the associated laboratory reports and chain-of-custody documentation is attached in Appendix D.

North USTs

Four soil samples (A1-011701 through A4-011701) were collected from the north UST excavation: one soil sample from each end of the former UST location in native soil, approximately 6 inches below the bottom of the UST. In addition, one soil sample (AS1-011701) was collected from the associated soil stockpile.

Each soil sample collected from the north excavation was analyzed using northwest chemical analytical method NWTPH-HCID. Laboratory reports indicate that neither gasoline, diesel nor heavy oil was detected at concentrations that exceed respective analytical method reporting limits. Soil sample analytical results are summarized in Table 1. A copy of the associated laboratory reports and chain-of-custody documentation is attached in Appendix D.

Excavation Backfill & Impacted Soil Disposal

South UST

Upon receipt and evaluation of soil sample laboratory analytical reports, the stockpiled soil associated with the south excavation (66.08 tons) was transported to TPS Technologies, Inc. of Portland, Oregon for treatment via thermal desorption. Copies of the associated manifests are attached in Appendix E. Treated soil from TPS Technologies, Inc. was back-hauled to the site and used as backfill material for the south UST excavation. A copy of the associated laboratory analyses for this soil is attached in Appendix F

North USTs

Upon receipt and evaluation of soil sample laboratory analytical reports, the stockpiled soil associated with the north excavation was placed back into the north excavation. Additional imported clean sand backfill material was used to complete backfill of the north excavation.

Summary and Conclusions

PNE Corp. decommissioned one 1,000-gallon and two 800-gallon heating oil USTs at the referenced facility on January 16, 2002. PNE Corp. transported 66.08 tons of petroleum-impacted soil off-site for treatment and disposal. UST excavations were back-filled with site soil and clean imported fill material.

Laboratory reports for soil samples collected from the bottoms of the south excavation indicate the presence of diesel-range petroleum, at a concentration below the applicable Washington Department of Ecology Method A cleanup Level. Also, groundwater was not encountered and no chlorinated compounds were detected. Therefore, no further action regarding soil contamination is required at this site.

Limitations

This work was performed by PNE Corp. in accordance with generally accepted professional practices related to the nature of the work accomplished in the same or similar localities, at the time that the services were performed, and in accordance with agreements and understanding with the client, which may not be disclosed in this document. This report and its contents are for the specific application to the referenced project and for the exclusive use of the client. No other warranty, expressed or implied, is made. Any reliance on this report, in whole or in part, by a third party is at the party's sole risk.

If you have any questions or require further information, please feel free to call.

Sincerely,

PACIFIC NORTHERN ENVIRONMENTAL CORP.

Att: Ta

Table 1

oseph A. Sturza

Figures 1 and 2

Environmental Services Director

Appendices A through F

Cc/Att: Mr. Bob Miller, Miller & Sons Construction

Table 1 Soil Sample Summary (mg/Kg)

Sample	· Dale	Depth	N	WTPH-HC	CID -	NW	TPH-Dx	1.00					USEPA 82601				
Name	Collected	(A bys)	Gasoline	Diesel	Heavy Oil	Diesei	Heavy Oil	n-Butylbenzene	sec-Butylbenzene	lert-Bulylbenzene	Elhylbanzene	Isopropylbenzene	p-Isopropyltoluene	n-Propvibenzene	1,2,4-Trimethylbenzene	1 3 5-Trimethylpenzene	Total Vylene
11-011702	1/17/02	8	ND	ND	ND	NA	NA	NA .	NA .	NA -	NA	NA NA	NA	NA	NA NA	NA NA	NA NA
2-011702	1/17/02	8	ND	ND	ND	NA -	NA	NA	NA .	NA .	NA	NA NA	NA	NA	NA.	NA NA	NA.
3-011702	1/17/02	8	ND	ND	ND	NA.	NA	NA .	NA .	NA NA	NA	NA NA	NA NA	NA	NA NA	NA NA	NA NA
4-011702	1/17/02	8	ND	ND	ND	NA	NA	NA	NA NA	NA	NA	NA	NA .	NA.	NA NA	NA NA	NA NA
\$1-011702	1/17/02	Stockpile	ND	ND	ND	NA	NA	NA	NA NA	NA	NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA
11-011702	1/17/02	3	NA	NA	NA	796	ND	NA .	NA NA	NA NA	NA	NA NA	NA	NA NA	NA NA	NA NA	NA NA
2-011702	1/17/02	6	NA .	NA.	NA	ND	ND	NA	NA NA	NA	NA	NA .	NA NA	NA NA	NA NA	NA NA	NA NA
3-011702	1/17/02	6	NA	NA.	NA NA	ND	ND	NA .	NA NA	NA NA	NA	NA NA	NA	NA NA	NA NA	NA NA	NA NA
4-011702	1/17/02	4	NA	NA	NA	ND	ND	NA	NA NA	NA	NA	NA NA	NA NA	NA	NA NA	NA NA	NA NA
5-011702	1/17/02	3	NA	NA	NA	1,220	ND	4.3	3.3	3.6	0.4	1.1	4.1	3.0	22.3	12.0	2.8
S1-011702	1/17/02	Stockpile	ND	D	D	ND	1,820	3.1	2.7	ND	0.4	0.8	2.9	2.3	15.4	7.7	2.4
IS1-011702	1/17/02	Stockpila	NA	NA	NA	ND	1,420	1.5	1.1	0.9	ND	ND	1.2	1.0	5.9	2.9	0.8
		MRL:	20	50	100	25	100	0.3	0.3	0.3	0.3	0.3	0.3	0,5			
		Ecology	100	2000	2000	2000	2000	NE	NE	NE NE	6	NE NE	NE NE	NE	0.3 NE	0.3 NE	0.3

Note: 1 - Daly compounds with detections above analytical method reparing limits are summerized.

ft bgs - last below ground surface

mg/Kg - Milligarms per kilogram

MRL - Analytical method reporting limit
Ecology - Washington Department of Ecology Method A Cleanup Levels (173-340-900 WAC)

D - Detected at or above the MRL

ND - Not Detected at or above the MRL

NA - Not enelyzed

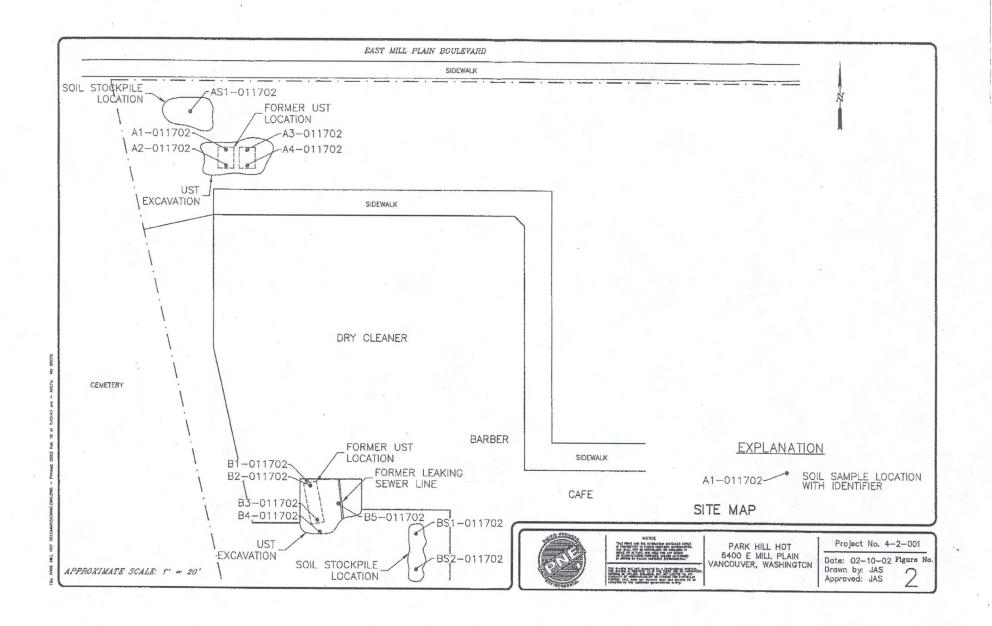
NE - Melhod A Cleanup Lavel Not Established USFPA - 11 S Environmental Protection Agency





PARK HILL HOT 6400 E MILL PLAIN VANCOUVER, WASHINGTON Project No. 4-2-001

Date: 02-10-02 Figure No. Drawn by: JAS Approved: JAS



APPENDIX A

UST Rinse Water and Residue Disposal Receipts

STATEMENT



Cowlitz Clean Sweep
55 International Way
Longview, WA 98632
(360) 423-6316
FAX (360) 423-3409
EPA ID# WAD988467197
COWLICS061R7
CC 47339
USDOT467272

SUBTOTAL _____

TOTAL.

PARK AILL Center

Combustible Liquid NA 1993

Flammable Liquid UN 1203

OTHER

DATE 1-15-02

STATEMENT

009014

PLEASE PAY LAST AMOUNT IN BALANCE COLUMN

4-2-001 Combination Bill of Lading and Freight Bill 6319 1) Ancoucer Receiving Facility: Generator: Received by (TSD): CCS Operation (1) Customer warrants that the waste petroleum products being transferred by the above collector do not contain any contaminant's Including, without limitations, pesticides, chlorinated solvents at concentrations greater than 1000 PPM. PCB's at greater concentrations than 2 PPM (or PPM with Manifest), or any other material classified as hazardous waste by 40 CFR part 261, customer Subparts C and D (implementing the Federal Resource Conservation and Recovery Act or by any equivalent State hazardous waste or hazardous substance classification program. Should laboratory tests find this waste product not in compliance with 40 CFR Part 261, customer (generator) agrees to pay for all disposal costs incurred. Date_ DESCRIPTION QUANTITY CHARGES CREDITS BALANCE

A FINANCIAL CHARGE OF 1 1/2% Per month may be applied to any Past Due amount. Past Due accounts may be placed on C.O.D. without notification. If outside collection action is necessary, purchaser shall pay all costs of collection including reasonable attorney's fees

SENT BY: OIL RE-REFINING CO. Generator Name + HAL	HIII CENTER Location (0) 17 E. MIII THIN KI)
Generator Fills Out	Waste/Material Profile (One completed profile per product)
(Including used solutions)containing Oil Filters ☐ Antifreeze☐ Oil Use Unused Fuels and Type:Descript Water/Petroleum Mixtures:Type Percent Water ☐ % Actual Ca Transformer Oil PCB under 2PF	DIY Used Oil Machine Lubricating Oil Machine Tool Cutting and/or Cooling Fluids g at least 1% petroleum Hydraulic Oil Brake Fluid Refrigeration Oil Fuel Filters d d as a Non-Contact Heat Transfer Media Solvent ion(where and how generated)
Generator hereby certifies that no	dilution of oil containing PCBs has occurred below any regulatory threshold:
Other (Specify) : Solvent : Flash Point	ump Sludge Contaiminated Soil Spill Cleanup Material Attach all pertinent documents Attach all pertinent documents h any hazardous waste? Yes No lf yes, Stop Call Supervisor
Is Material Mixed With Hazardou	de the following information: ate Tested Clor-D-Tect Test Results PPM Date Tested 1-15 of PH G s Waste?Yes No If yes, Stop call Supervisor ? Yes No If Toxic? Yes No It Listed? Yes No It Flash Over 140 F Yes No It
	results; Matthe Generation in detail) Attach all Documentation Links & Bugst's Land of the Commission Links & Bugst's Land of Commission
Name and Title of Person providin	
	Certification & Guarantee
document is accurate and complete. I fur and waste listed or identified as hazardou waste in compliance with the used oil mix	als profile (or authorized representative of the generator). I hereby certify that the information contained in this her certify that this material has NOT been mixed with any contaminants including, without limitations, Pesticides waste under RCRA, or if mixing has occurred, this material has been mixed with an ignitable-only hazardous are rule, or C.E.G. exemption. In the event that the material described in this document is in fact hazardous waste, any for proper enalysis, transportation, sprage and disposal. Title: Date 15-02 Receiving Facility Data
Is Waste/Material Acceptable Accepted Material Acceptable Rejected Reason Returned to Generator? Yes	e for Processing?: Yes No Description: CDT-Off PH=6 Title PO. Date 1-15-02

__ 1 ...

** RECEIVING RECORD ** No. 2015712

CEIVED BY: Oil Re-Refining Company EPA# WAD980986012 PLANT: PORTLAND 4150 N. Suttle Road Phone (503) 286-8352 EMPLOYEE: ACE Portland, OR 97217 Fax (503) 286-5027 PAGE: 1 ----RCEIVED FROM: Cowlitz Clean Sweep Customer ID# 711 55 International Way Phone: 206-428-6318 MTE:01/15/2002 Longview, WA 98632 Driver: MARK The second secon QTY. UNIT ITEM MNF %H20 %SOLID B/L# and the second second and the time and the time one took come the time of time of time of the time of time N 70.% 0.% 1. EACH Clor-D-Tect Kit

GEN: PARK HILL CENTER

CDT=0 PPM, PH=6, JOB#4-2-001.

TAL EAC

220. GAL. Emulsified Fuel

11 70.%

GEN: PARK HILL CENTER CDT=0 PPM. PH=6. JOB#4-2-001.

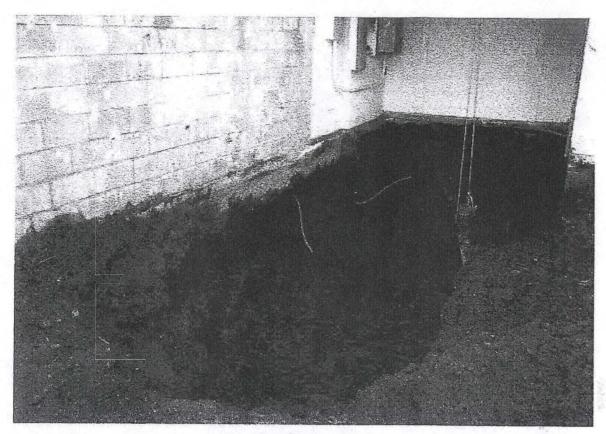
MAL GAL 220. A 100 Mark 1000 Mark 1000 Mark 100 Mark

ecommer warrants that the waste petroleum products being rucoured as the otain any contaminante including, without limitation, besticidas, chloring icente at total concentrations greater than 1000 FPM, FCD's gests than The or any other material classified as masardous wasta by 20 CPMc part los sparts C and D timplementing the Federal Acedurca Conservation and Recovery t) or by any State or local bazardous waste classification program. Esculo contactory tests find this waste product not in compliance with 40 uFr. part is customer agrees to pay for ell disposal chats incurred.

DATE: 01/15/2002

APPENDIX B

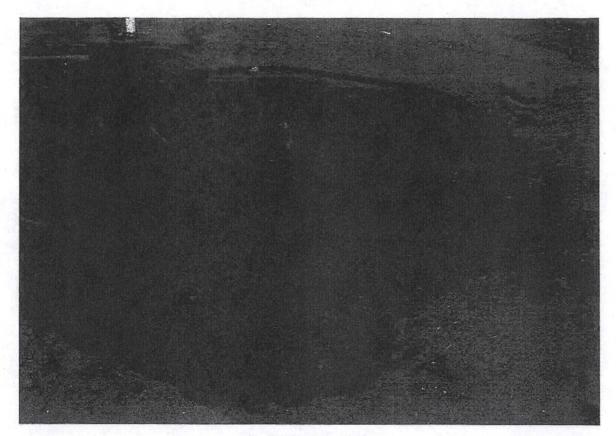
Photographs



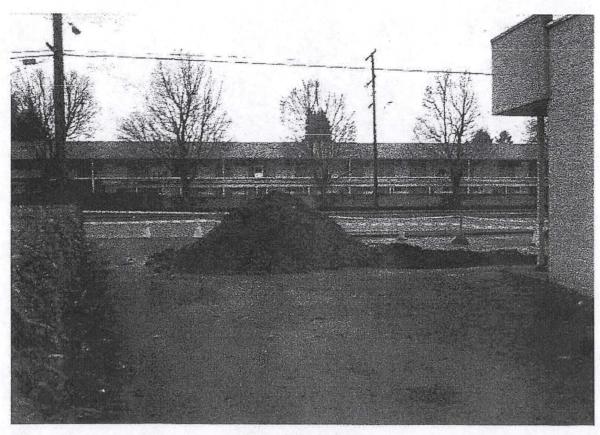
South UST Excavation



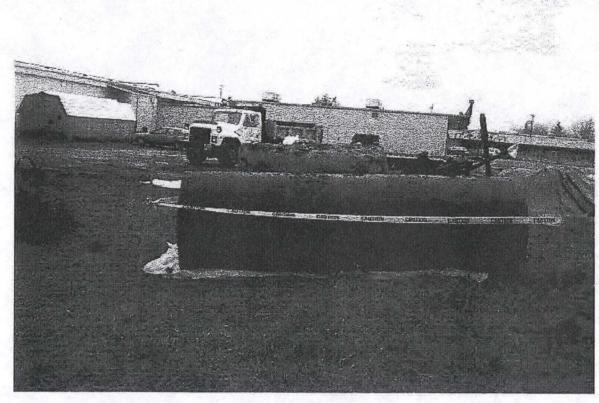
South Soil Stockpile



North UST Excavation



North Soil Stockpile



USTs



USTs

APPENDIX C UST Disposal Receipt

Bob Partridge Metals recycles (503)254-6382

Invoice

Invoice #: 011802 Invoice Date: 01/20/02 Customer ID:988463197

Ship To:

Cowlitz Clean Sweep

55 International Way Longview,WA 98632

Date	Your Order #	Our Order#	Sales Rep.	FOB	Ship Via	Terms	Tax ID
01/18/02 -	PO# 51686	8132	Bob			Net 10	

Quantity	Item ·	Units	Description	Discount %	Taxable	Unit Price	Total
3	Tanks	Each	Disposal old metal storage Tanks	0	N/A	\$50.00	\$150.00
						11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	**
	5						
		1 2 2					
	1					Sublotal	\$150.00
						Tax	
						Shipping	
		<u>.</u>			*	Miscellaneous	
		8.7				Balance Due	\$150.00

REMITTANCE To Bob Partridge ID# 541-56-4529 5314 N.E. 74th Ave

Portland, OR 97218

APPENDIX D

Laboratory Report
And
Chain-of-Custody Documentation



LABORATORY REPORT

Pacific Northern Environmental

Attn: Joe Sturza

1081 Columbia Boulevard

Longview WA 98632

PROJECT NAME/SITE:

Park Hill HOT

REPORT NUMBER:

40434

PROJECT NUMBER:

4-2-001

REPORT DATE:

1-18-02

EXTRACTION DATE:

1-17-02

PAGE:

1 of 1

NW TPH-HCID

Analyte: Petroleum Hydrocarbon Identification (Gasoline, Petroleum, Heavy Oil) for soil (dry weight basis)

Field ID	Lab ID	23871 - 2477 - 2	Identification	Surrogate Recovery (%)			
		Gasoline	Diesel	Heavy Oil			
A1-011702	H4187	ND	ND	ND	79		
A2-011702	H4188	ND	ND	ND	77		
A3-011702	H4189	ND	ND	ND	87		
A4-011702	H4190	ND	ND	ND	88		
ASI-011702	H4191	ND	ND	ND	85		
BSI-011702	H4197	ND	Detected	Detected	*		
BLANK		ND	ND	ND	-		
Reporting Limits (mg/Kg)	-	20	50	100	•		

Surrogate is Chlorooctane

ND = Not Detected (below reporting limit or detection limit)

NWTPH-Dx

Analyte: Total Petroleum Hydrocarbon Quantification for soil (dry weight basis)

Field ID	Lab ID	Diesel mg/Kg (ppm)	Heavy Oil mg/Kg (ppm)	Surrogate Recovery (%)
B1-011702	H4192	796†	ND	
B2-011702	H4193	ND†	ND	88
B3-011702	H4194	NDf	ND	91
B4-011702	H4195	ND	ND	96
B5-011702	H4196	1,220†	ND	54
BS1-011702	H4197	ND†	1,820 ‡	70
BS2-011702	H4198	ND†	1,420 ‡	66
BLANK	_	ND	ND	# =
Reporting Limit	-	25	100	

Surrogate is o-Terphenyl

ND = Not Detected (below reporting limit or detection limit)

- ‡ Oil range petroleum products, may be light oil.
- † Gas range petroleum products also present. May be weathered gas or mineral spirits.
- * Surrogate peak is not discernible on chromatogram from analyte peak,

^{*} Surrogate peak is not discernible on chromatogram from analyte peak.

File : C:\HPCHEM\1\DATA\VOA\JAN_2002\1-17-02\H4196.D

Operator : mark

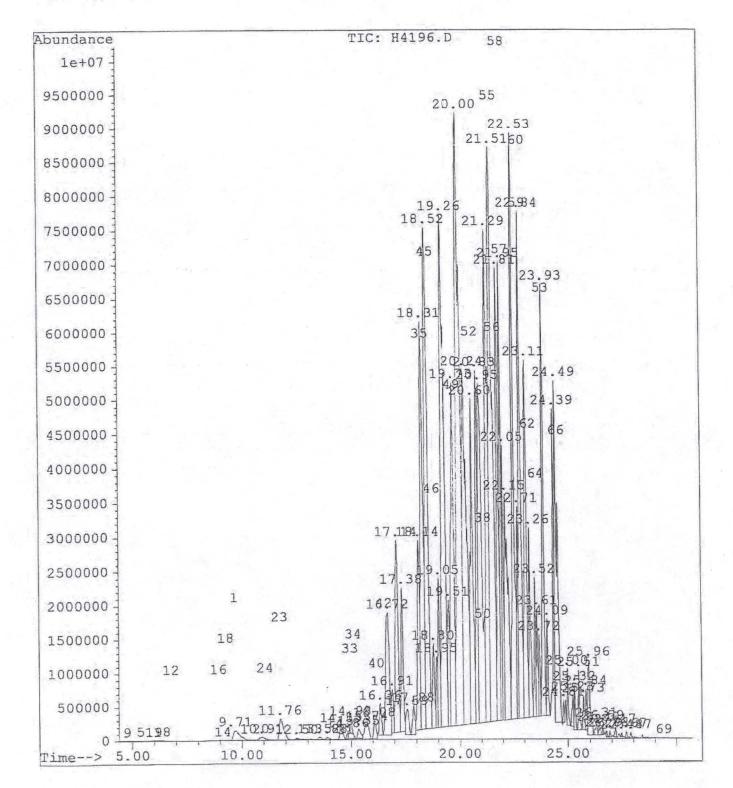
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Instrument: 5972 - In

Sample Name: soil 50ul H4196

Misc Info : w/ 10uL I.S.CS3-118A, 10uL Surr.CS3:118B

Vial Number: 3



File : C:\HPCHEM\1\DATA\VOA\JAN 2002\1-17-02\H4197.D

Operator : mark

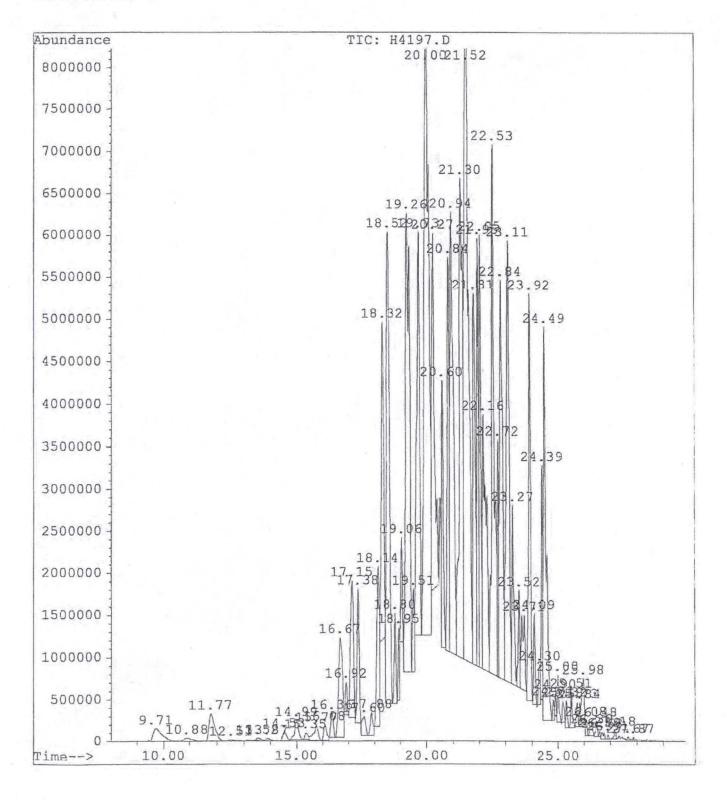
Acquired : 17 Jan 102 8:53 pm using AcqMethod VOA NEW

Instrument: 5972 - In

Sample Name: soil 50ul H4197

Misc Info : w/ 10uL I.S.CS3-118A, 10uL Surr.CS3:118B

Vial Number: 4



: C:\HPCHEM\1\DATA\VOA\JAN_2002\1-17-02\H4198.D

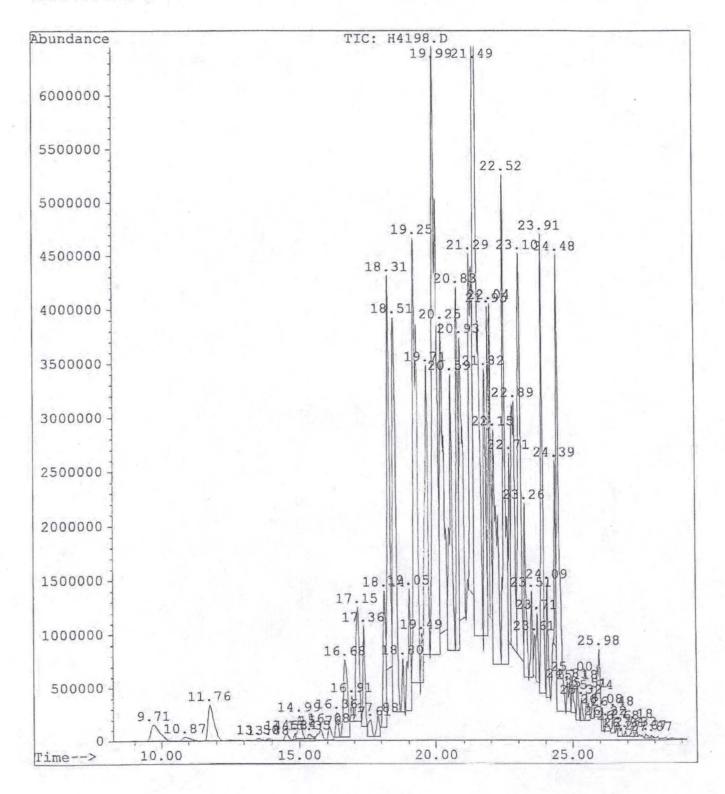
Operator : mark
Acquired : 17 Jan 102 9:42 pm using AcqMethod VOA_NEW

Instrument: 5972 - In

Sample Name: soil 50ul H4198

Misc Info : w/ 10uL I.S.CS3-118A, 10uL Surr.CS3:118B

Vial Number: 5



Wy'East

Wy'East Environmental Sciences, Inc.

TTA	N. Kast.	od 8260
EFA	IVICTUR	UU OZUU

Analyte: Volatile Organics in Soil

Field ID: BS1 - 011702

Lab ID: H4197 Extraction date: 1-17-02 Site Name: Park Hill HOT

Site Number: 4-2-001 Report Number: 40434

CAS#	Compound	Sample (mg/Kg)	Blank	Detection Limit
67-64-1	Acetone	ND	ND	2.6
71-43-2	Benzene	ND	ND	0.3
108-86-1	Bromobenzene	ND	ND	0.3
74-97-5	Bromochloromethane	ND	ND	0.3
75-27-4	Bromodichloromethane	ND	ND	0.3
75-25-2	Bromoform	ND	ND	0.3
74-83-9	Bromomethane	ND	ND	0.5
78-93-3	2-Butanone (MEK)	ND	ND	1.4
104-51-8	n-Butylbenzene	3.1	ND	0.3
135-98-8	sec-Butylbenzene	2.7	ND	0.3
98-06-6	tert-Butylbenzene	ND	ND	0.3
56-23-5	Carbon tetrachloride	ND	ND	0.3
108-90-7	Chlorobenzene	ND	ND	0.3
75-00-3	Chloroethane	ND	ND	1.0
67-66-3	Chloroform	ND	ND	0.3
74-87-3	Chloromethane	ND	ND	0.3
95-49-8	2-Chlorotoluene	ND	ND	0.3
106-43-4	4-Chlorotoluene	ND	ND	0.3
128-48-1	Dibromochloromethane	ND	ND	0.3
96-12-8	1.2-Dibromo-3-chloropropane	ND	ND	0.3
106-93-4	1,2-Dibromoethane	ND	ND	0.3
74-95-3	Dibromomethane	ND	ND	0.3
95-50-1	1,2-Dichlorobenzene	ND	ND	0.3
541-73-1	1,3-Dichlorobenzene	ND	ND	0.3
106-46-7	1.4-Dichlorobenzene	ND	ND	0.3
75-71-8	Dichlorodifluoromethane	ND	ND	0.7
75-34-3	1.1-Dichloroethane	ND	ND	0.3
107-06-2	1,2-Dichloroethane	ND	ND	0.3
75-35-4	1.1-Dichloroethylene	ND	ND	0.9
156-59-2	cis-1,2-Dichloroethylene	ND	ND	0.5
156-60-5	trans-1,2-Dichloroethylene	ND	ND	0.3
78-87-5	1,2-Dichloropropane	ND	ND	0.3
142-28-9	1,3-Dichloropropane	ND	ND	0.3
594-20-7	2,2-Dichloropropane	ND	ND	0.3

Lab ID:	H4197			
CAS#	Compound	Sample (mg/Kg)	Blank	Detection Limit
563-58-6	1,1-Dichloropropene	ND	ND	0,3
10061-01-5	cis-1,3-Dichloropropene	ND	ND	0.3
10061-02-6	trans-1,3-Dichloropropene	ND	ND	0.3
100-41-4	Ethylbenzene	0.4	ND	0.3
87-68-3	Hexachlorobutadiene	ND	ND	0.3
591-78-6	2-Hexanone	ND	ND	1.4
98-82-8	Isopropylbenzene	0.8	ND	0.3
99-87-6	p-Isopropyltoluene	2.9	ND	0.3
75-09-2	Methylene chloride	ND	5	2.1
1634-04-4	Methyl-t-butylether (MTBE)	ND	ND	0.9
108-10-1	4-Methyl-2-pentanone	ND	ND	1.4
91-20-3	Naphthalene	ND	ND	0.3
103-65-1	n-Propylbenzene	2.3	ND	0.5
100-42-5	Styrene	ND	ND	0.3
630-20-6	1,1,1,2-Tetrachloroethane	ND	ND	0.3
79-34-5	1,1,2,2-Tetrachloroethane	ND	ND	0.3
127-18-4	Tetrachloroethylene	ND	ND	0.3
108-88-3	Toluene	ND	ND	0.3
87-61-6	1,2,3-Trichlorobenzene	ND	ND	0.5
120-82-1	1,2,4-Trichlorobenzene	ND	ND	0.5
71-55-6	1,1,1-Trichloroethane	ND	ND	0.3
79-00-5	1,1,2-Trichloroethane	ND	ND	0.3
79-01-6	Trichloroethylene	ND	ND	0.3
75-69-4	Trichlorofluoromethane	ND	ND	0.5
96-18-4	1.2.3-Trichloropropane	ND	ND	0.5
95-63-6	1.2.4-Trimethylbenzene	15.4	ND	0.3
108-67-8	1,3,5-Trimethylbenzene	7.7	ND	0.3
75-01-4	Vinyl chloride	ND	ND	0.7
1330-20-7	Total Xylenes	2.4	ND	0.3
	Surrogates:	Percent Recovery:		
460-00-4	4-Bromofluorobenzene	109		
107-06-2	1.2-Dichloroethane-d4	98		
108-88-3	Toluene-d8	100		

Wy'East

Wy'East Environmental Sciences, Inc.

EPA Method 8260

Analyte: Volatile Organics in Soil

Site Name: Park Hill Hot Field ID: BS2-011702 Site Number: 4-2-001 H4198.D Lab ID:

Report Number: 40434 1-17-02 Extraction date:

CAS#	Compound	Sample (mg/Kg)	Blank	Detection Limit
67-64-1	Acetone	ND	ND	2.4
71-43-2	Benzene	ND	ND	0.3
108-86-1	Bromobenzene	ND	ND	0.3
74-97-5	Bromochloromethane	ND	ND	0.3
75-27-4	Bromodichloromethane	ND	ND	0.3
75-25-2	Bromoform	ND	ND	0.3
74-83-9	Bromomethane	ND	ND	0,5
78-93-3	2-Butanone (MEK)	ND	ND	1.3
104-51-8	n-Butylbenzene	1.5	ND	0.3
135-98-8	sec-Butylbenzene	1.1	ND	0.3
98-06-6	tert-Butylbenzene	0.9	ND	0.3
56-23-5	Carbon tetrachloride	ND	ND	0.3
108-90-7	Chlorobenzene	ND	ND	0.3
75-00-3	Chloroethane	ND	ND	1.0
67-66-3	Chloroform	ND	ND	0.3
74-87-3	Chloromethane	ND	ND	0.3
95-49-8	2-Chlorotoluene	ND	ND	0.3
106-43-4	4-Chlorotoluene	ND	ND	0.3
128-48-1	Dibromochloromethane	ND	ND	0.3
96-12-8	1,2-Dibromo-3-chloropropane	ND	ND	0.3
106-93-4	1,2-Dibromoethane	ND	ND	0.3
74-95-3	Dibromomethane	ND	ND	0.3
95-50-1	1,2-Dichlorobenzene	ND	ND	0.3
541-73-1	1,3-Dichlorobenzene	ND	ND	0.3
106-46-7	1.4-Dichlorobenzene	ND	ND	0.3
75-71-8	Dichlorodifluoromethane	ND	ND	0.6
75-34-3	1.1-Dichloroethane	ND	ND	0.3
107-06-2	1,2-Dichloroethane	ND	ND	0.3
75-35-4	1.1-Dichloroethylene	ND	ND	0.8
156-59-2	cis-1,2-Dichloroethylene	ND	ND	0.5
156-60-5	trans-1,2-Dichloroethylene	ND	ND	0.3
78-87-5	1,2-Dichloropropane	ND	ND	0.3
142-28-9	1,3-Dichloropropane	ND	ND	0.3
594-20-7	2.2-Dichloropropane	ND	ND	0.3

Lab ID:	H4198.D			
CAS#	Compound	Sample (mg/Kg)	Blank	Detection Limit
563-58-6	1,1-Dichloropropene	ND	ND	0.3
10061-01-5	cis-1,3-Dichloropropene	ND	ND	0.3
10061-02-6	trans-1,3-Dichloropropene	ND	ND	0,3
100-41-4	Ethylbenzene	ND	ND	0.3
87-68-3	Hexachlorobutadiene	ND	ND	0.3
591-78-6	2-Hexanone	ND	ND	1,3
98-82-8	Isopropylbenzene	ND	ND	0.3
99-87-6	p-Isopropyltoluene	1.2	ND	0.3
75-09-2	Methylene chloride	ND	ND	1.9
1634-04-4	Methyl-t-butylether (MTBE)	ND	ND	0.8
108-10-1	4-Methyl-2-pentanone	ND	ND	1.3
91-20-3	Naphthalene	ND	ND	0.3
103-65-1	n-Propylbenzene	1.0	ND	0.5
100-42-5	Styrene	ND	ND	0.3
630-20-6	1,1,1,2-Tetrachloroethane	ND	ND	0.3
79-34-5	1,1,2,2-Tetrachloroethane	ND	ND	0.3
127-18-4	Tetrachloroethylene	ND	ND	0.3
108-88-3	Toluene	ND	ND	0,3
87-61-6	1,2,3-Trichlorobenzene	ND	ND	0.5
120-82-1	1,2,4-Trichlorobenzene	ND	ND	0.5
71-55-6	1.1.1-Trichloroethane	ND	ND	0.3
79-00-5	1,1,2-Trichloroethane	ND	ND	0.3
79-01-6	Trichloroethylene	ND	ND	0.3
75-69-4	Trichlorofluoromethane	ND	ND	0.5
96-18-4	1,2,3-Trichloropropane	ND	ND	0.5
95-63-6	1.2.4-Trimethylbenzene	5,9	ND	0,3
108-67-8	1,3,5-Trimethylbenzene	2.9	ND	0.3
75-01-4	Vinyl chloride	ND	ND	0.6
1330-20-7	Total Xylenes	0.8	ND	0.3
	Surrogates:	Percent Recovery:		
460-00-4	4-Bromofluorobenzene	111		
107-06-2	1.2-Dichloroethane-d4	99		
108-88-3	Toluene-d8	100		

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eport Created on: 23 Jan 02 11:07 PM

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Instrument Method: VOA.MTH

Analysis Method : DEFAULT.MTH

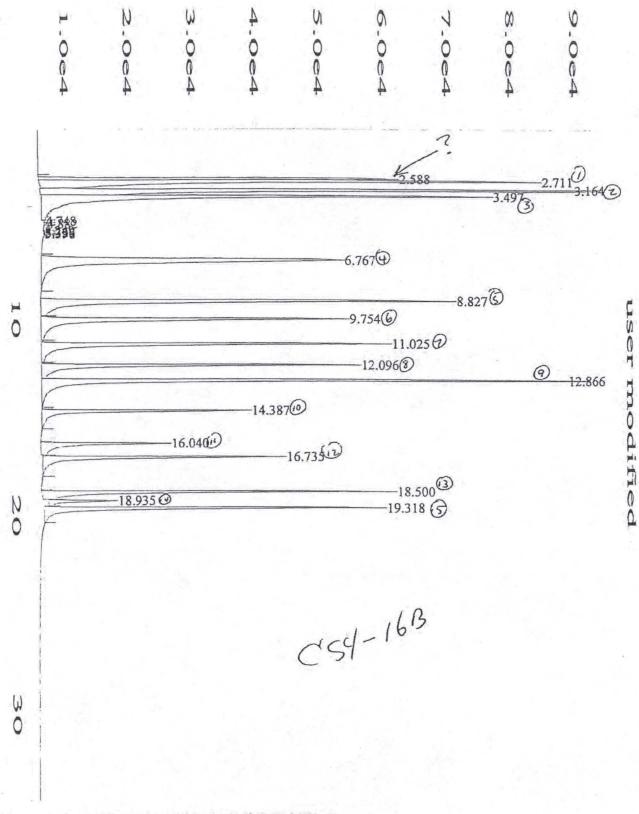
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Pk#	Ret Time	Area	Height	Type	Width	Area %
1	2.588	344855	56731	BF	0.076	4.4499
2	2.7110	773815	79050	MM	0.163	9.9850
3	3.164@	901235	113727	FF	0.114	11.6292
4	3.4973	739548	70904	MM	0.174	9.5429
5	-4.748	\1340 ,	348	FV	0.052	0.0173
6	4.882	1272/	496	VV	0.038	0.0164
7	5.249	347	179	PV	0.038	0.0044
8	5.326	62X3	180	VV	0.048	0.0079
8	5.357	Z9A	159	VV	0.031	0.0038
10	5.398	(323	161	VF	0.031	0.0042
11	6.767D	751074	47676	MM	0.263	9.6916
12	8.8275	662612	65260	MM	0.169	8.5501
13	9.7546	496210	48556	MM	0.170	6.4029
14	11.0257	461684	55172	MM	0.139	5.9574
15	12.096 €	376873	50229	MM	0.125	4.8630
16	12.8669	700285	86195	MM	0.135	9.0362
17	14.387.0	239019	33070	MM	0.120	3.0842
18	16.0404	184483	20588	MM	0.149	2.3805
19	16.735 12	284126	38407	MM	0.123	3,6663
20	18.500 3	379544	55851	FF	0.098	4.8975
21	18.935,+	65247	10918	MM	0.100	0.8419
22	19.318 15	384955	53829	MM	0.119	4.9673

otal area = 7749752

Jser Modified

C54-16B



: C:\HPCHEM\1\DATA\1-22-02\HALL0062.D Data File Name Page Number : 1 Operator : mark Vial Number : ANALYZER1 Instrument Injection Number: 1 Sample Name Sequence Line : 1 Run Time Bar Code: Acquired on : 20 Jan 02 09:12 AM Report Created on: 23 Jan 02 11:07 PM Instrument Method: VOA.MTH Analysis Method : DEFAULT.MTH

Data File Name : C:\HPCHEM\1\DATA\1-22-02\HALL0063.D

Derator : mark Page Number : 1
[nstrument : ANALYZER1 Vial Number : 63
Sample Name : Injection Number : 1
Run Time Bar Code: Sequence Line : 1

Acquired on : 20 Jan 02 10:01 AM Instrument Method: VOA.MTH Report Created on: 23 Jan 02 11:10 PM Analysis Method : DEFAULT.MTH

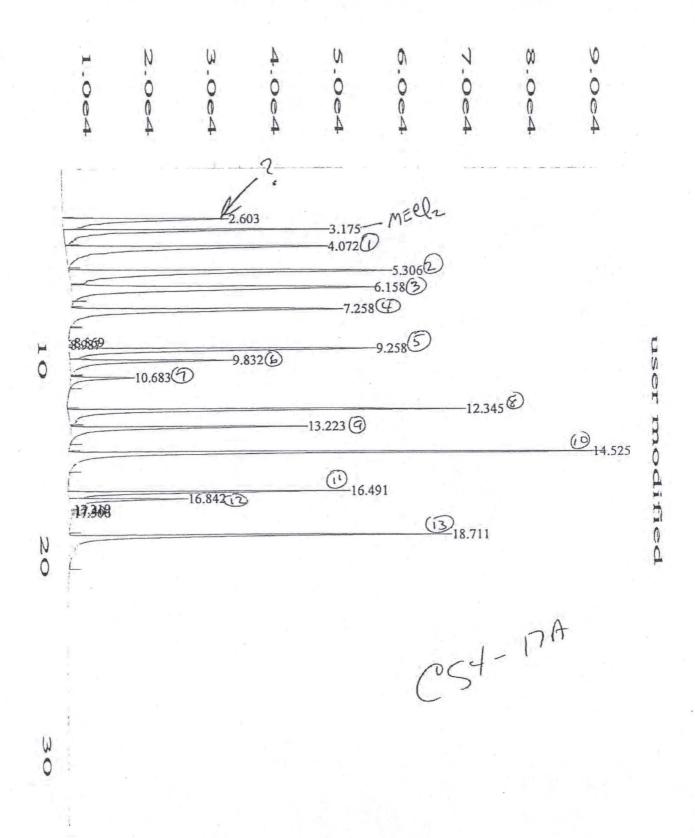
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11	2 603	328762	26609	MM	0.206	5,2398
2	3.175	376102	42296	MM	0.148	5.9943
3	4.072	534142	41744	MM	0.213	8.5132
4	5.306	6629112	51158	MM	0.216	10.5655
5	6.158	6674913	47990	MM	0.232	10.6385
6	7.258	5194274	43249	MM	0.200	8.2787
7	8.869	6979	850	FV	0.109	0.1112
8	.8.987	745	223	VV	0.044	0.0119
9	9.258	4864755	48655	VF	0.130	7.7535
10	9.832	2501156	26020	MM	0.160	3.9863
11	10.683	869307	10190	MM	0.142	1.3855
12	12.345	4918908	62906	MM	0.130	7.8398
13	13.223	3042519	37657	MM	0.135	4.8492
14	14.525	65708910	84654	MM	0.129	10.4727
15	16.491	291363"	44806	FV	0.038	4.6438
16	16.842	15920812	19058	VV	0.114	2.5375
17	17.319	-1163	376	VV	0.042	0.0185
18	17.401	2982	554	VV	0.072	0.0475
19	17.506	915	264	VF	0.058	0.0146
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Total area = 6274287

User Modified

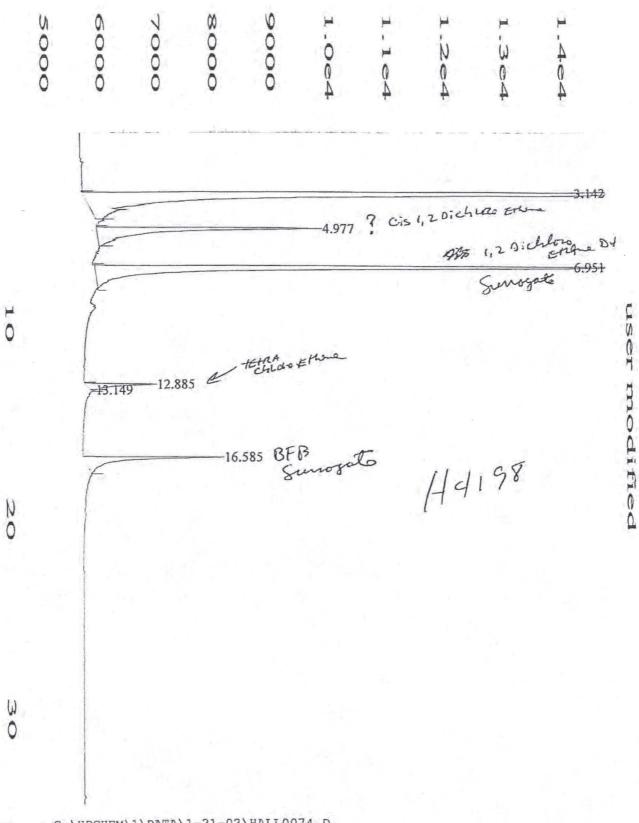
C54-17A



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               : mark
                                             Vial Number
               : ANALYZER1
Instrument
                                             Injection Number: 1
Sample Name
                                             Sequence Line
Run Time Bar Code:
                                             Instrument Method: VOA.MTH
Acquired on : 20 Jan 02 10:01 AM
Report Created on: 23 Jan 02 11:11 PM
                                            Analysis Method : DEFAULT.MTH
```

SAMPLE # H4196 H4196	MATRIX WEIGHT (grams) 14.5 14.5	MEOH WEIGHT (grams) 14.3 14.3	INJ. VOL uL 25 25	sample analyte area 35818 9728	SURR. IN SAMPLE 24071 24071	# H4196 H4196	VOL. HAL CONC mg/Kg 0.24 0.07	VOLATILE HALOGENATED COMPOUND cis-1,2-dichloroethene Tetrachloroethene	gate recovery 94.5
H4197	11.5	15.8000	25	29376	22441	H4197	0.28	cis-1,2-dichloroethene	88
H4197	11.5	15.8000	25	20814	22441	H4197	0.21	Tetrachloroethene	
H4198	12.4	15.8000	25	53090	25739	H4198	0.46	cis-1,2-dichloroethene	101
H4198	12.4	15.8000	25	10625	25739	H4198	0.10	Tetrachloroethene	

A those peoults are consistent with the S260 peoults
Deflinit for cis 1/2 is of Deflinit to tetra is . 2



: C:\HPCHEM\1\DATA\1-21-02\HALL0074.D Data File Name Page Number : 1 : 74 : mark Operator Vial Number : ANALYZER1 Instrument Injection Number: 1 Sample Name Sequence Line : 1 Run Time Bar Code: : 19 Jan 02 04:19 PM Instrument Method: VOA.MTH Acquired on Report Created on: 23 Jan 02 11:28 PM Analysis Method : DEFAULT.MTH

ta File Name : C:\HPCHEM\1\DATA\1-21-02\HALL0074.D

perator : mark
istrument : ANALYZER1
imple Name : Page Number : 1 Vial Number : 74 Injection Number: 1

Sequence Line : 1

H4198

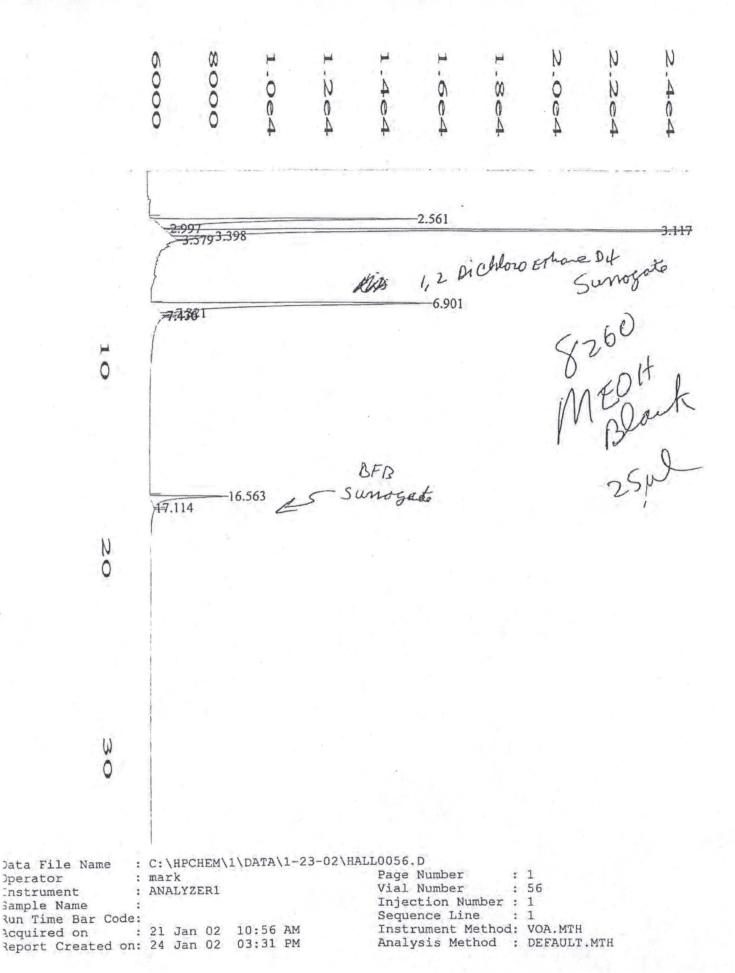
in Time Bar Code: equired on : 19 Jan 02 04:19 PM port Created on: 23 Jan 02 11:28 PM Instrument Method: VOA.MTH Analysis Method : DEFAULT.MTH

g 2 in C:\HPCHEM\1\DATA\1-21-02\HALL0074.D

Pk#	Ret Time	Area	Height	Type	Width	Area %
	3.142	305666	32814	MM	0.155	58.5021
2	4.977	53090	3941	MM	0.225	10.1611
3	6.951	127147	9624	MM	0.220	24.3349
4	12.885	10625	1264	BV	0.108	2.0335
5	13.149	221	87	VB	0.042	0.0423
6	16.585	25739	2478	MM	0.173	4.9262

otal area = 522488

ser Modified



-+-	File	Nome	· C.	\ HPCHEM\	11	DATAL	1-2	23-02	HALLOOS6.D	
ata	4112	Name		THE CHELL		LATITAL.	4 6		111111111111111111111111111111111111111	

perator	: mark	Page Number	:	1	
nstrument	: ANALYZER1	Vial Number	:	56	
ample Name	AND THE COLUMN S. D. WARDON N. C.	Injection Number	:	1	
un Time Bar	Code:	Sequence Line	:	1	

cquired on : 21 Jan 02 10:56 AM Instrument Method: VOA.MTH eport Created on: 24 Jan 02 03:31 PM Analysis Method : DEFAULT.MTH

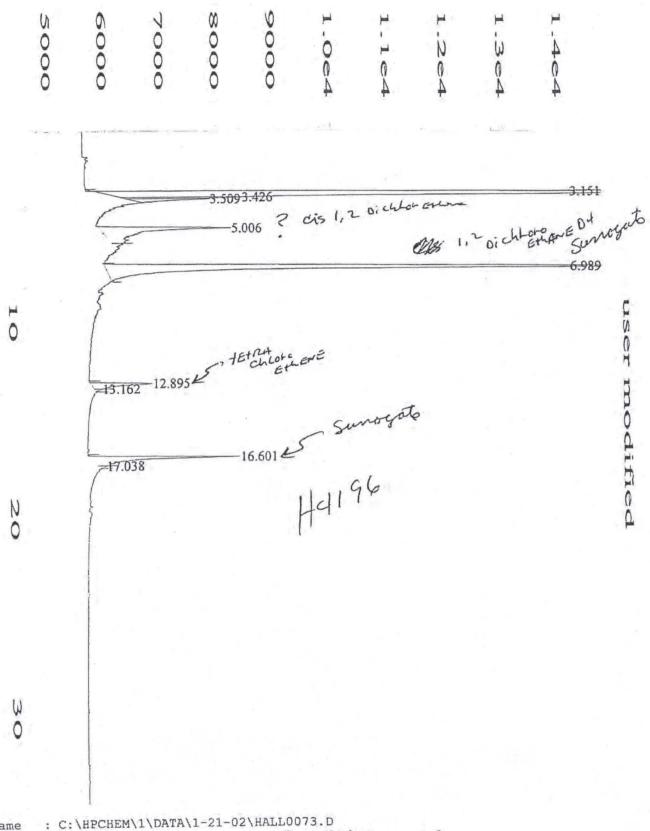
ia.	2	in	C:	\HPCHEM\	1	DATA\	1-2	3-02	\HALL005	6.D
-----	---	----	----	----------	---	-------	-----	------	----------	-----

Pk#	Ret Time	Area	Height	Туре	Width	Area %
	2.561	90694	9205	BV	0.137	21.1503
2	2.997	458	216	VV	0.030	0.1067
3	3,117	182290	25826	VV	0.097	42.5109
4	3.398	9584	1490	VV	0.107	2.2351
5	3.579	393	204	VV	0.032	0.0916
6	6.901	116726	9732	BV	0.144	27.2211
7	7.321	2570	515	VV	0.065	0.5993
8	7.436	271	139	VV	0.032	0.0631
9	7.470	180	95	VV	0.032	0.0420
10	16.563	25481	2695	BV	0.117	5.9424
11	17.114	161	54	VB	0.050	0.0375

'otal area = 428808

8260

MEDH Blank 25



H4196

	1.5									
ata	File 1	Name	: C:	\HPCHEM\	11	DATA	1-21	-021	HALL007	73.D

perator : mark
nstrument : ANALYZER1
ample Name : C:\HPCHEM\
mark
: ANALYZER1 Page Number : 1 Vial Number : 73 Injection Number: 1 un Time Bar Code: Sequence Line : 1

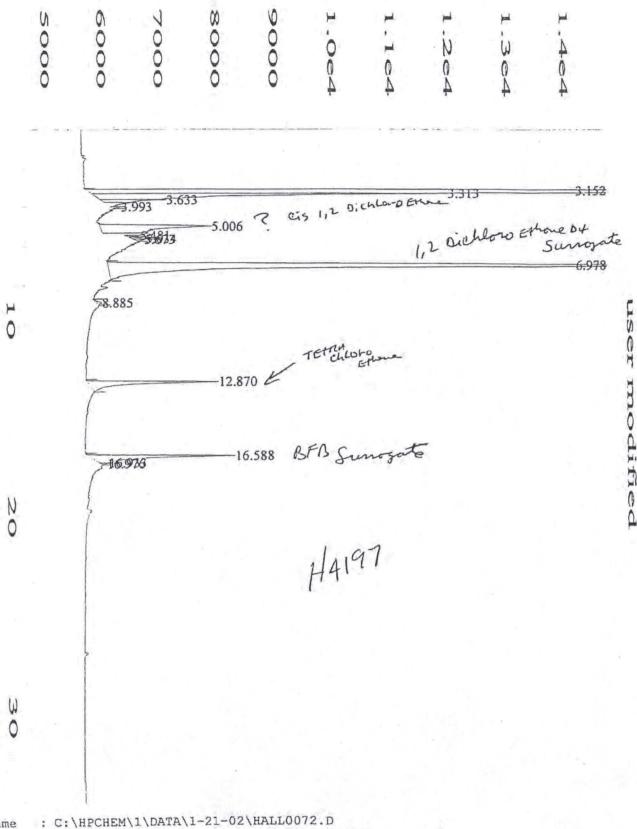
Instrument Method: VOA.MTH
Analysis Method : DEFAULT.MTH cquired on : 19 Jan 02 03:30 PM eport Created on: 23 Jan 02 11:27 PM

ig. 2 in C:\HPCHEM\1\DATA\1-21-02\HALL0073.D

Pk#	Ret Time	Area	Height	Type	Width	Area %
11						
1	3.151	213164	28720	BV	0.106	50.9183
2	3.426	6405	2167	VV	0.049	1.5300
3	3.509	8301	1452	VF	0.074	1.9829
4	5.006	35818	2329	MM	0.256	8.5558
5	6.989	120129	9578	MM	0.209	28.6951
6	12.895	9728	1075	BV	0.118	2.3238
7	13.162	537	122	VB	0.073	0.1282
8	16.601	24071	2648	BV	0.121	5.7498
9	17.038	486	127	VV	0.050	0.1161

otal area = 418639

ser Modified



ata File Name Page Number Vial Number : 1 perator : mark : ANALYZER1 astrument Injection Number: 1 ample Name Sequence Line : 1 un Time Bar Code: Instrument Method: VOA.MTH : 19 Jan 02 02:40 PM cquired on eport Created on: 23 Jan 02 11:26 PM Analysis Method : DEFAULT.MTH

H4197

ata File Name : C:\HPCHEM\1\DATA\1-21-02\HALL0072.D

perator : mark
strument : ANALYZER1
ample Name : Page Number : 1 Vial Number : 72

Injection Number : 1 in Time Bar Code: Sequence Line : 1

equired on : 19 Jan 02 02:40 PM Instrument Method: VOA.MTH Analysis Method : DEFAULT.MTH aport Created on: 23 Jan 02 11:26 PM

ig. 2 in C:\HPCHEM\1\DATA\1-21-02\HALL0072.D

Pk#	Ret Time	Area	Height	Type	Width	Area %
' 1	3.152	205390	30435	BV	0.092	42.7766
2	3.313	48380	6151	VV	0.131	10.0761
3	3.633	6621	1147	VV	0.073	1.3790
4	3.993	560	180	VF	0.042	0.1165
5	5.006	29376	1956	MM	0.250	6.1182
6	5.481	663	245	FV	0.037	0.1380
7	5.634	943	232	VV	0.052	0.1964
8	5.673	620	176	VF	0.047	0.1291
9	6.978	143161	11219	MM	0.213	29.8161
10	8.885	620	87	BV	0.092	0.1292
11	12.870	20814	2292	BV	0.122	4.3350
12	16.588	22441	2542	BV	0.117	4.6738
13	16.933	225	156	VV	0.024	0.0468
14	16.976	332	101	VV	0.055	0.0692

otal area = 480146

ser Modified



EPA Method 8260

Analyte: Volatile Organics in Soil

Field ID:

B5-011702

Lab ID:

H4196

Extraction date: 1-16-02

Site Name: Park Hill hot Site Number: 4-2-001

Report Number: 40434

CAS# Comp	ound	Sample (mg/Kg)	Blank	Detection Limit	
67-64-1 Acetor	ne	ND	ND	1.9	
71-43-2 Benze	ne	ND	ND	0.2	
108-86-1 Bromo	benzene	ND	ND	0.2	
74-97-5 Bromo	ochloromethane	ND	ND	0.2	
75-27-4 Bromo	odichloromethane	ND	ND	0.2	
75-25-2 Bromo	oform	ND	ND	0.2	
74-83-9 Bromo	omethane	ND	ND	0.4	
78-93-3 2-Buta	anone (MEK)	ND	ND	1.0	
104-51-8 n-Buty	lbenzene	4.3	ND	0.2	
135-98-8 sec-Bu	itylbenzene	3,3	ND	0.2	
98-06-6 tert-Bi	utylbenzene	3.6	ND	0.2	
56-23-5 Carbo	n tetrachloride	ND	ND	0.2	
108-90-7 Chlore	obenzene	ND	ND	0.2	
75-00-3 Chloro	oethane	ND	ND	0.7	
67-66-3 Chloro	oform	ND	ND	0.2	
74-87-3 Chlore	omethane	ND	ND	0.2	
95-49-8 2-Chlo	orotoluene	ND	ND	0.2	
106-43-4 4-Chlo	orotoluene	ND	ND	0.2	
128-48-1 Dibroi	mochloromethane	ND	ND	0.2	
96-12-8 1,2-Di	ibromo-3-chloropropane	ND	ND	0.2	
106-93-4 1,2-Di	ibromoethane	ND	ND	0.2	
74-95-3 Dibroi	momethane .	ND	ND	0.2	
95-50-1 1,2-Di	ichlorobenzene	ND	ND	0.2	
541-73-1 1,3-D	ichlorobenzene	ND	ND	0.2	
	ichlorobenzene	ND	ND	0.2	
75-71-8 Dichlo	prodifluoromethane	ND	ND	0,5	
	ichloroethane	ND	ND	0.2	
107-06-2 1,2-D	ichloroethane	ND	ND	0.2	
	ichloroethylene	ND	ND	0.6	
그는 그렇게 하늘을 잃어 있었다. 아이지	2-Dichloroethylene	ND	ND	0.4	
	1,2-Dichloroethylene	ND	ND	0.2	
	ichloropropane	ND	ND	0.2	
	ichloropropane	ND	ND	0.2	
and the second s	ichloropropane	ND	ND	0.2	

Lab ID:	H4196			
CAS#	Compound	Sample (mg/Kg)	Blank	Detection Limit
563-58-6	1,1-Dichloropropene	ND	ND	0.2
10061-01-5	cis-1,3-Dichloropropene	ND	ND	0.2
10061-02-6	trans-1,3-Dichloropropene	ND	ND	0.2
100-41-4	Ethylbenzene	0.4	ND	0.2
87-68-3	Hexachlorobutadiene	ND	ND	0.2
591-78-6	2-Hexanone	ND	ND	1.0
98-82-8	Isopropylbenzene	1.1	ND	0.2
99-87-6	p-Isopropyltoluene	4.1	ND	0.2
75-09-2	Methylene chloride	ND	5	1.5
1634-04-4	Methyl-t-butylether (MTBE)	ND	ND	0.6
108-10-1	4-Methyl-2-pentanone	ND	ND	1.0
91-20-3	Naphthalene	ND	ND	0.2
103-65-1	n-Propylbenzene	3.0	ND	0.4
100-42-5	Styrene	ND	ND	0.2
630-20-6	1,1,1,2-Tetrachloroethane	ND	ND	0.2
79-34-5	1,1,2,2-Tetrachloroethane	ND	ND	0.2
127-18-4	Tetrachloroethylene	ND	ND	0.2
108-88-3	Toluene	ND	ND	0.2
87-61-6	1,2,3-Trichlorobenzene	ND	ND	0.4
120-82-1	1,2,4-Trichlorobenzene	ND	ND	0.4
71-55-6	1,1,1-Trichloroethane	ND	ND	0.2
79-00-5	1,1,2-Trichloroethane	ND	ND	0.2
79-01-6	Trichloroethylene	ND	ND	0.2
75-69-4	Trichlorofluoromethane	ND	ND	0.4
96-18-4	1,2,3-Trichloropropane	ND	ND	0.4
95-63-6	1,2,4-Trimethylbenzene	22.3	ND	0.2
108-67-8	1,3,5-Trimethylbenzene	12.0	ND	0.2
75-01-4	Vinyl chloride	ND	ND	0.5
1330-20-7	Total Xylenes	2.8	ND	0.2
	Surrogates:	Percent Recovery:		
460-00-4	4-Bromofluorobenzene	106		
107-06-2	1.2-Dichloroethane-d4	104		
108-88-3	Toluene-d8	105		

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Environmental Sciences, Inc.

Research & Laboratory Services

CHAIN OF CUSTODY	PARK	HILL HOTS	a 2415 SE	11th Ave. • Portland, Oregon	97214 • (503) 231-9320 •	FAX (503) 231-93
PROJECT # 4-2-00\	MILLER	250NS 1107		TATE VASHINGTON	PURCHASE ORDE	ER#
SOMPANY PNE CORP.	REPORT	ATTENTION	P	YASHINGTON HONE NUMBER 1360) 423-6316	FAX NUMBER (360)423-	
SAMPLES COLLECTED BY	DATE(S)	TURZA COLLECTED 12	T	IME(S) COLLECTED	SAMPLES CHILLE	D TO 4° C?
PRESERVATIVE USED? (HCI, etc.)		-489		Regular 🖾	3-5 Days □
FIELD ID	MEDIA	CONTAINER	VOLUME ETC	ANALYSIS	REQUIRED	LAB ID
A1-011702	SOIL	1602 66ass Jan		NWTPH-HCID		H4187
A2-011702				NW TPH-HCIP		H4188
A3-011702				WWTPH-Haip		H4189
A4-011702		1		NWTPH-HOID		H4190
AS1-011702		1		NWTPH-HOID '		H419:1
81-011702				NWTPH-PX	-18	H4192
82-011702		V		NWTPH-PX		H4193
B3-011702				NWTPH-DX		H419.4
B4-011702	V	V	X.,	NWTPH-DX		H4195
B5-011702		V	÷	NWT1H-Dx 8260		H4196
BS1-011702				NWTPH-HCLD, NWTI	H-Dx, FPA 8260	H4197
B52-011702				NWTPH-PX, EPA 8	1260	H4198
RELINQUISHED BY		01/6	ATE / TIME RI	ECEIVED BY	1	DATE / TIME
RECINQUISHED BY				ECEIVED BY LAB	neeg 1/17	DATESTIME

Submission of samples with testing requirements to WyEast Environmental Sciences will be understood to be an agreement for services in accordance with the conditions listed on the back of the client copy

APPENDIX E Soil Recycling Manifests

-	Manifest		PS Technolo Non-	Hazardo			↓ Manifest # ↓		
1	Date of Shipment	Responsible for	Payment 77	ansporter T	Truck #:	Facility #:	Given by TPS: Load		
-	1/23/02	Cons	ultant	11.10	- Trans	0 109	06830 ¢o		
	Generator's Name and Billin STEVEN MEMO 3505 ROYAL	OVICE.	***		Generator's Phone	1-4	Generator's US EPA ID No.		
-					STEVEN	I	Customer Account Number with TPS:		
L	VANCGUVER,	WA 98662		USA	(360)	969-0979	9STEMEN		
	Consultant's Name and Billin				Consultant's Phone	7.700			
	PACIFIC NOR 1081 COLUMB	THERN ENVIRON IA BLVD	MENTAL	P	(360) Person to Contact JOE ST	423-6216 TURZA			
	LONGVIEW, W	A 98632		USA.	AX#: /360)	423-3409	Customer Account Number with TPS: 1000497		
T	Generation Site (Transport fr	rom): (name & address)		S	ite Phone #:		BTEX		
		HOPPING CENTE		I	Person to Contact:	983 861	TPH		
-		ILL PLAIN BLV	ID		STEVE	1	Levels		
-	JOB PO# 556	86		F	AX#:		AVG. Levels		
L	VANCOUVER,			USA		363 0373			
		ort to): (name & address. ECYCLERS OF C	DREGON	1	Person to Contact:	35-9525 1 QUAST	Facility Permit Numbers		
1	PORTLAND, C	- 27703		732		IC-1712			
H	Transporter Name and Maili				ransporter's Phon		Transporter's US EPA ID No.:		
-				F	AX #:		Customer Account Number with TPS:		
L	Description of Soil	Moisture Content	Contaminated by:	Approx.	Qty: Descrip	tion of Delivery	Gross Weight Tare Weight Net Weig		
	Sand O Organic O Clay O Other O	0-10%	Gas D Diesel D Other D				N3700 4318		
	Sand O Organic O Clay O Other O	0-10%	Gas D Diesel D Other D				70520 (35.		
L	List any exception to items listed a Generator's and/or consul Sheet completed and certi	ltant's certification:	I/We certify that the Generation Site sh	e soil refer own above	enced herein is a	taken entirely fron as been added or a	n those soils described in the Soil Data lone to such soil that would alter it in		
I	απν τυαν.						, Month , Day , Ye		
	any way. Print or Type Name:	Generator O	Consultant 0	Signate	ure and date:				
	Print or Type Name: Transporter's certification condition as when receive without off-loading, addin	n: I/We acknowledg ed. I/We further cen ng to, subtracting fro	e receipt of the soil rtify that this soil is m or in any way del	described s being di laying deli	above and certi	ed from the Gene	is being delivered in exactly the same ration Site to the Designated Facility		
	Print or Type Name: Transporter's certification condition as when receive without off-loading, addin	n: I/We acknowledg ed. I/We further cen ng to, subtracting fro	e receipt of the soil rtify that this soil is m or in any way del AS	described s being di laying deli Signah	above and certification above and certification above and certification and certific	ed from the Gene	is being delivered in exactly the same ration Site to the Designated Facility		

TPS FACILITY CODY

Manifes	t i			ardous Soils	ecycling	↓ Manifest	# 1		
Date of Shipment	Responsible fo			rter Truck #:	- Facility #:				
1-23-02		sultant	A	1.07	2110 Rett		Load		
Generator's Name and Billi	ng Address:			Generator's F	hone #:	Generator's US EPA I	D No.		
STEVEN MEM	DVICK				60) 883-061	7			
3505 ROYAL	OAKS DR.			Ferson to Cor					
				FAX#:	EVEN				
VANCOUVER,	WA 98662		and the second	teh	50: 969-097	Customer Account N 9 9ST EME	THE ARE SHOWN THE		
Consultant's Name and Bill	ng Address:			Consultant's	Phone #:				
FACIFIC NO	RTHERN ENVIRO	NMENTAL		(3)	50) 423-631	8 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
1081 COLUM	BIA BLVD			Person to Cor	And the state of t				
					E STURZA				
LONGVIEW, V	7A 98632		T	FAX#: JEA (36	50) 423-3409	Customer Account No 100049			
Generation Site (Transport f	rom): (name & address			Site Phone #:		BTEX Levels			
PARK HILL S	SHOPPING CENT	ER			101 000-001				
A TRAS OCES	MILL PLAIN BL	VD		Person to Co	ntact.	TPH Levels			
JOE FO# 558					EVEN	The state of the s			
VANCOUVER,				FAX#:		AVG. Levels			
Designated Facility (Transpo		d		Facility Phone	# 9:0_057	Facility Permit Numb			
					-"• i-735-9525	racinty remit ivanio	215		
	RECYCLERS OF			Person to Con					
9333 N HAPA	ORGATE STREE	T.		SHA	TEAUQ HOR				
				FAX#:					
FORTLAND, C	R 97203		USA		1-240-1712		Termenostrof-11C PDA TO LE		
Transporter Name and Mail	ng Address:	Transpo			Phone #:	Transporter's US EPA	Transporter's US EPA ID No.:		
				Person to Cor FAX#:	ntact:	Customer Account Nu			
Description of Soil	Moisture Content	Contaminated	by: Appr	ox. Qty: De	scription of Delive	ry Gross Weight Tare V	Velaht Net Wela		
Sand D Organic D	0-10%	Gas O				1.110110			
Clay D Other D	10 - 20% Q 20% - over Q	Diesel O				107890	4320		
Sand O Organic O	0-10%	Gas D					#		
Clay O Other O	10 - 20% D 20% - over D	Diesel D Other D				6/6 VA (2h 07		
	above:			²⁴ us	2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	7/1/01	20,00		
List any exception to items listed									
Generator's and/or consu	tant's certification: fied by me/us for the	I/We certify the Generation Si	at the soil 1 te shown a	referenced herein bove and nothin	n is taken entirely ng has been added	from those soils described i	n the Soil Data oould alter it in		
Generator's and/or consu	tant's certification: fied by me/us for the	I/We certify the Generation Si	at the soil i te shown a	referenced hereis bove and nothir	n is taken entirely ng has been added	from those soils described i or done to such soil that u	n the Soil Data rould alter it in		
Generator's and/or consu Sheet completed and certi	ltant's certification: fied by me/us for the Generator	I/We certify the Generation Si Consultant	te shown a	referenced herein bove and nothin ignature and date:	n is taken entirely ng has been added	or done to such soil that u	ould alter it in		
Generator's and/or consu Sheet completed and certi any way. Print or Type Name:	fied by me/us for the	Consultant	te shown a	bove and nothin	ng has been added	or done to such soil that u	oould alter it in		
Generator's and/or consu Sheet completed and certi- any way. Print or Type Name: Transporter's certification	Generator Generator T: I/We acknowledg	Consultant re receipt of the	te shown a	bove and nothing ignature and date:	ng has been added	or done to such soil that u	ould alter it in Onth Day Yes Cactly the same		
Generator's and/or consu Sheet completed and certi any way. Print or Type Name: Transporter's certification condition as when receive	Generator Generator	Consultant consultant re receipt of the retify that this s	te shown a	bove and nothing ignature and date: ibed above and g directly trans	ng has been added certify that such ported from the (or done to such soil that u	ould alter it in Onth Day Yes cactly the same		
Generator's and/or consu Sheet completed and certi- any way. Print or Type Name: Transporter's certification	Generator Generator	Consultant consultant re receipt of the retify that this s	te shown a	bove and nothing ignature and date: ibed above and g directly trans	ng has been added certify that such ported from the (or done to such soil that u	ould alter it in onth Day Yes cactly the same grated Facility		
Generator's and/or consu Sheet completed and certi any way. Print or Type Name: Transporter's certification condition as when receiv without off-loading, addir	Generator Generator	Consultant consultant re receipt of the retify that this s	te shown a	bove and nothing and date: ibed above and g directly trans, delivery to such	ng has been added certify that such ported from the (or done to such soil that u	ould alter it in onth Day Yes cactly the same grated Facility		
Generator's and/or consu Sheet completed and certi any way. Print or Type Name: Transporter's certification condition as when receiv without off-loading, addir	Generator Generator	Consultant consultant re receipt of the retify that this s	te shown a	bove and nothing and date: ibed above and g directly trans, delivery to such	ng has been added certify that such ported from the (or done to such soil that u	onth Day Yes cactly the same gnated Facility		
Generator's and/or consu Sheet completed and certi any way. Print or Type Name: Transporter's certification condition as when receiv without off-loading, addir	Generator Generator	Consultant consultant re receipt of the retify that this s	te shown a	bove and nothing and date: ibed above and g directly trans, delivery to such	ng has been added certify that such ported from the (or done to such soil that u	onth Day Yes cactly the same gnated Facility		
Generator's and/or consu Sheet completed and certi any way. Print or Type Name: Transporter's certification condition as when receiv without off-loading, addir	Generator Generator	Consultant consultant re receipt of the retify that this s	te shown a	bove and nothing and date: ibed above and g directly trans, delivery to such	ng has been added certify that such ported from the (or done to such soil that u	onth Day Yes cactly the same gnated Facility		
Generator's and/or consu Sheet completed and certi- any way. Print or Type Name: Transporter's certification condition as when receiv without off-loading, addir Print or Type Name: Discrepancies:	Generator Generator	Consultant Consultant The receipt of the stiffy that this some or in any was	te shown a	bove and nothin ignature and date: ibed above and g directly trans delivery to such grature and date	certify that such ported from the Castle.	or done to such soil that u	onth Day Yes cactly the same gnated Facility		
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Please print or type.

APPENDIX F

UST Nest Recycled Fill Laboratory Report



Seattle 11/20 North Greek Frong NO. 8 2 600 dutes, P. 21-ac azs 425,9200 fax 425,420 Los B, Spakene, WA 93205-4776 508,924,5200 fax 508,924,5290 Portland 9405 SW Nimbus Number 1, 200

503.524.52.00 133.504.52.32.00 5405.5W Nimbus Avenut, Bezverton, DR 97005-7152 503.906.5200 15x 503.906.9210 20352 Empire Avenue, Suite F-1, Bend, DR 97701-5711 541,283,3310 fax 541.382.7588

TPS Technologies 9333 N. Harborgate Street Portland, OR 97203

Project Regular Jobs

Project Number: NA

Project Manager: Joe Wontack

Reported:

01/21/02 17:31

Gasoline Hydrocarbous per NW TPH-Gx Method

North Creek Analytical - Portland

Analyse	Result	Reporting Limit	Units	Dilution	Method	Prepared	Analyzed	Batch	Notes
6635 (P2A0399-01) Sofi					Sampled: 01/1	5/02 Rece	ived: 01/16/	02	
Gasoline Range Hydrocarbons	ND	2.00	mg/kg dry	-1-	NW TPH-Gx	01/16/02	01/16/02	2010481	i i fist
Surr: a,a,a-TFT	70.0 %	50-150							
6635 (P2A0399-02) Soil				5 5 15	Sampled: 01/1	5/02 Rece	ived: 01/16/	02	
Gasoline Range Hydrocarbons	ND	2.00	mg/kg dry	1	NW TPH-Gx	01/16/02	01/16/02	2010481	
Sur: a.a.e-TFT	78.4 %	50-150		-2.7					

BACKFILL Soil
FROM TPS.

North Creek Analytical - Portland

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Becan L Come



425,420,9200 for 425,420, NO. 826 3216p.

TPS Technologies 9333 N. Harborgate Street

Project Regular Jobs Project Number: NA

Reported:

Portland, OR 97203

Project Manager: Joe Womack

01/21/02 17:31

Diesel and Heavy Range Hydrocarbons per NWTPH-Dx Method

North Creek Analytical - Portland

Analyte	Result	Reporting Limit	Units	Dilution	Method	Prepared	Analyzed	Batch	Notes	
6635 (P2A0399-01) Soil		Sampled: 01/15/02 Received: 01/16/02								
Diesel Range Organics	ND	25.0	mg/kg dry	1	NWTPH-Dx	01/18/02	01/19/02	2010542		
Heavy Oil Range Hydrocarbons	ND	50,0	0	. 4	и.	H H	¥			
Surr: 1-Chlorooctadecane	103 %	50-150								
6635 (P2A0399-02) Soil		4		Sampled: 01/15/02 Received: 01/16/02						
Diesel Range Organics	ND	25.0	mg/kg dry	1	NWTPH-Dx	01/18/02	01/19/02	2010542		
Heavy Oil Range Hydrocarbons	ND	50.0	•	ñ	*	*		ille y elen		
Surr: I-Chlorooctadecane	105 %	50-150		and the same of th	0.77%			No. of Street	Earth each	

BACKFILL SOIL
FROM TPS.

North Creek Analytical - Portland

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Brean L Come



B Photographic Log

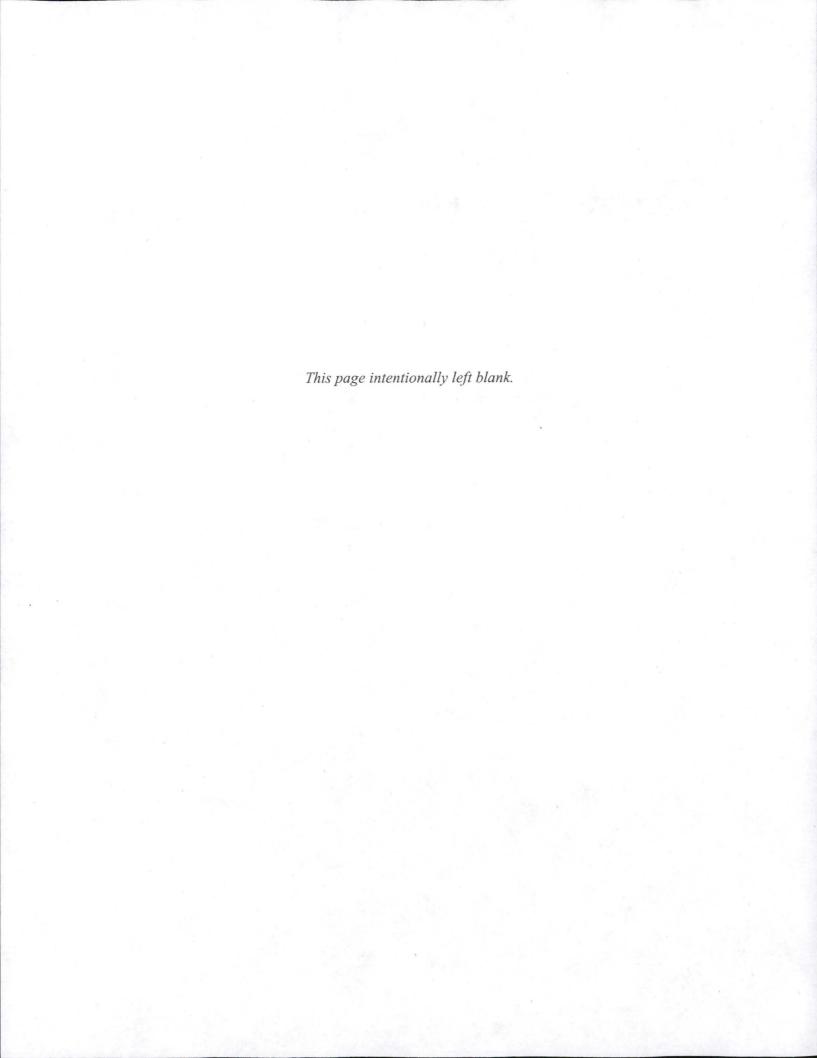




Photo 1 Northeast corner of Custom Care Cleaners. Retail entrance and counter are in photo.

Direction: Southwest Date: 5/30/14 Time: 15:10



Photo 3 Park Hills Cemetery located adjacent to the west side of the Custom Care Cleaners space.

Direction: South Date: 5/30/14 Time: 15:11



Photo 2 North side of Custom Care Cleaners.

Direction: East-Southeast Date: 5/30/14 Time: 15:11



Photo 4 Southern portion of property associated with Park Hill Shopping Center.

Direction: South Date: 5/30/14 Time: 15:16

CUSTOM CARE CLEANERS

Vancouver, Washington



Photo 5 Southern side of Park Hill Shopping Center. Custom Care Cleaners and cemetery visible on far left side of photo.

Direction: Northwest

Date: 5/30/14

Time: 15:17



Photo 7 Front retail counter and clothes storage in Custom Care Cleaners.

Direction: North Date: 5/30/14 Time: 14:29

TDD Number: 13-09-0005 Photographed by: Derek Pulvino



Photo 6 West side of Custom Care Cleaners tenant space.

Direction: North Date: 5/30/14 Time: 14:59



Photo 8 View of steam presses in center of Custom Care Cleaners space.

Direction: South Date: 5/30/14 Time: 14:28

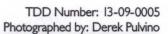




Photo 9 Water heater/boilers near southeast corner of Custom Care Cleaners.

Direction: East Date: 5/30/14 Time: 14:30



Photo 10 Dry cleaning machines located in SW corner of Custom Care Cleaners. All use "green" dry cleaning solvent.

Direction: South Date: 5/30/14 Time: 14:23

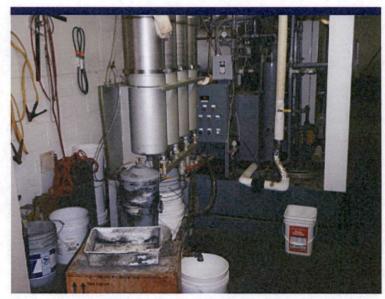


Photo 11 Stills/filters associated with green dry cleaning machines.

Direction: North-Northwest Date: 5/30/14 Time: 14:25



Photo 12 View of containers in southwest corner of Custom Care Cleaners, located near dry cleaning machines in Photo 10.

Direction: North Date: 5/30/14 Time: 14:24

TDD Number: 13-09-0005 Photographed by: Derek Pulvino



Photo 13 Inside of southern area of Custom Care Cleaners.

Broken CMU blocks show south end of demolished n/s wall.

Direction: Southeast Date: 5/30/14 Time: 14:23



Photo 14 Northern edge of former N/S wall in southern part of Custom Care Cleaners.

Direction: North Date: 5/30/14 Time: 14:54

TDD Number: 13-09-0005 Photographed by: Derek Pulvino



Photo 15 South addition to Custom Care Cleaners. Sewer cap visible.

Breaker panels also visible in PNE's "South UST Excavation" photo.

Direction: North-Northwest Date: 5/30/14 Time: 14:49



Photo 16 South exterior of Custom Care Cleaners. Area left of downspout is location of new CMU wall. Patches are on right.

Direction: North-Northwest Date: 5/30/14 Time: 14:20



Photo 17 Closer, straight-on view of seam between new (left) and old (right) sections of southern Custom Care Cleaners exterior wall.

Direction: South Date: 5/30/14 Time: 14:53

TDD Number: 13-09-0005 Photographed by: Derek Pulvino



Photo 18 Additional patches on exterior of CMU wall for Custom Care Cleaners. Wall pictured is the western wall of tenant space.

Direction: Northeast Date: 5/30/14 Time: 14:38